CITY AND COUNTY OF SAN FRANCISCO
DEPARTMENT OF CITY PLANNING

FINAL
85.693 ECRVZ

PINEVIEW SENIOR HOUSING
RESIDENTIAL DEVELOPMENT AND REZONING

ENVIRONMENTAL IMPACT REPORT

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Pineview Senior Housing
Environmental Impact Report

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I. SUMMARY

A. PROJECT DESCRIPTION

Pineview Housing Corporation, proposes to construct a 58-ft.-tall, six-story residential building containing 70 apartments for occupancy by low-income senior citizens and physically handicapped persons. Construction and rents would be subsidized by the federal government Housing Urban Development's (HUD) Section 8/202 program. The project architect is Gordon Chong and Associates.

The 12,615 gsf site is air-rights over the Broadway Tunnel (10,640 gsf) and Lot 42 of Assessor's Block 158 (1,975 gsf) which is a City-owned utility easement. A zoning reclassification from the existing RM-2 Classification (Residential Mixed, Moderate Density) to the proposed RM-4 Classification (Residential Mixed, High Density) would be required. There are no existing structures on either the air rights or the utility easement. One block east of the site, Broadway divides into two portions: one portion passes through the Broadway Tunnel and the other portion (referred to as Upper Broadway in this report), climbs upward to Russian Hill. The site adjoins the southwest corner of the intersection of Mason St. and Upper Broadway.

The 58-ft.-tall project would be a six-story building, and would contain about 36,100 gsf of floor area, excluding upper floor outdoor terrace and off-street parking areas. Pedestrian access to the project would be from a ground-floor plaza, fronting Mason St. and Upper Broadway. The ground-floor of the building would contain lobby and lounge areas, an office for visiting medical and social workers, and 10 parking spaces; the second floor would contain a dining hall, kitchen, and two apartments; floors three through six would contain 16 to 18 apartments per floor. Vehicular access would be along Upper Broadway to ten enclosed parking spaces on the rear of the ground floor of the building; two additional parking spaces would be located along Upper Broadway by the garage entrance.

The building would include about 30,900 gsf of residential space (70 units); about 4,700 gsf in a senior center (including social lounge, dining/multi-purpose room and warming kitchen); about 500 gsf of office space (for visiting social and medical workers); and about 3,400 gsf of parking space (12 independently accessible spaces).

The project would provide public open space on-site, in the form of a 2,685-sq.-ft. outdoor plaza at the corner of Mason St. and Upper Broadway. About 800 sq. ft. of private open space would be provided on upper floors in outdoor terraces.

B. MAIN ENVIRONMENTAL EFFECTS

LAND USE AND ZONING

The project would be a compatible use in the area, and would be of intermediate scale when compared to surrounding development.

The site is in an RM-2 (Residential Mixed, Moderate Density) zoning district. Under RM-2 zoning, the total permitted number of residential units designed for and occupied by senior citizens and the physically handicapped on the site is 42. A rezoning of the site from RM-2 to RM-4 (Residential Mixed, High Density) is proposed as part of the project. Under RM-4 zoning, the total permitted number of residential units designed for and occupied by senior citizens and the physically handicapped would be 126. The project would contain 70 units. The site is in a 65-A Height and Bulk District; building height is restricted to 65 ft., and above a height of 40 ft., the maximum permitted length is 110 ft., and the maximum permitted diagonal dimension is 125 ft.

Since the project site is in a residential district, and would be over 40 ft. in height, Conditional Use (CU) authorization would be required. Conditional Use authorization would also be required for the senior community center use within a residential district. The project would not include the required rear yard, and would therefore require a variance to permit less than the required rear yard (40 ft. for this site under RM-4 zoning). The project would require a variance from off-street parking requirements (14 spaces would be required, and 12 would be provided). The project would also require a variance from the requirement that required windows face a 25 ft. wide open area; the only windows of 32 of the units would face the 10-ft. wide utility easement on the south.

URBAN DESIGN

The six-story project would be taller and more visible than most existing residential structures in the immediate vicinity. It would be shorter than Our Lady of Guadalupe Church, across Upper Broadway from the site. Because of the slope, the roof of the project would be at about the same level as that of the ventilation building, adjacent to the site to the west, and of comparable scale to the City District Health Center No. 4 across Mason St. from the site. The project would be of comparable scale to newer low-income housing structures in the vicinity, such as the five-story On-Lok House building (1441 Powell St.), the six-story 895 Pacific Ave. building, and the six-story 990 Pacific Ave. building. The project would be shorter than some newer residential development on Russian Hill within two blocks north of the project, such as the 25-story 999 Green St. building, and the 30-story 857 Green St. (Royal Towers) building.

The project would not block views east along Broadway of San Francisco Bay and the Bay Bridge. The project would block views of lower stories of downtown office buildings from vantage points along Upper Broadway and from residences on the north side of Upper Broadway between Mason and Taylor Sts. The project would not be visible from points beyond about one-half block from the site in any direction. The project would block views of Our Lady of Guadalupe Church from points along a 10 ft. to 20 ft. portion of Mason St., south of Broadway. The project would block views of the Church and of Telegraph Hill from residences and sidewalks located at the northern end of Salmon St. and Himmelmann Place, immediately southwest of the site.

TRANSPORTATION

- During initial phases of construction (mobilization, site preparation and foundation and building platform preparation), one traffic lane in each direction and one pedestrian walkway in the Broadway Tunnel would be closed for approximately 24 weekdays between 9 a.m. and 3 p.m. This would result in back-ups and delays of traffic entering the tunnel and in congestion and slower traffic movement through the tunnel because of the 50% reduction in tunnel capacity. Construction activities during the 14-month period would generate an average of two truck trips per day, with an estimated maximum of three truck trips per day.

The residential portion of the project would generate about 280 person trips per day, and the senior center would generate up to 330 person trips per day. About 35 of the daily trips would occur during the p.m. peak hour. Most of the trips generated by the project would be pedestrian and transit trips. Almost all of the peak-hour trips from the project would be walking trips. Therefore, the project would not result in any impacts to traffic or transit.

The project would provide 12 off-street parking spaces. These spaces would be adequate to meet demand created by the project, as almost all trips would be made by walking and transit, and due to the relatively low auto ownership rates characteristic of low income housing developments in Chinatown. Under the City Planning Code, 14 spaces would be required for the project.

CONSTRUCTION NOISE

Construction activity would increase noise levels in the project vicinity for about 14 months. The project would not require pile driving during construction. The City's Noise Ordinance would require that impact tools (jackhammers, impact wrenches) must have both intake and exhaust muffled. During the nosiest phases of construction, nearby residences would experience interior noise levels which could interfere with concentration and communication. The Church's function as a place of reflection could be disrupted for a period of about six months. Mitigation proposed as part of the project includes prohibiting construction during times Church services are scheduled.

AIR QUALITY

The project would effectively lengthen the Broadway Tunnel, as the project would close the existing tunnel opening west of Mason St. The project could result in redistribution of vehicle emissions in and around the Broadway Tunnel. However, it is not anticipated that such redistribution would have any measurable impact on air quality either in the tunnel or at the eastern end of the tunnel. Sensitive receptors in the project vicinity include residents adjacent to the existing tunnel opening west of Mason St., residents and school children near the tunnel's eastern end, and pedestrians, bicyclists and motorists who use the tunnel and would include future residents of the project.

GROWTH INDUCEMENT

The project would add 70 residential units (30,900 gsf), about 4,700 gsf of lounge and dining space for senior citizens, about 3,485 gsf of open space (800 gsf would be on private terraces) and 12 parking spaces. The project would provide housing for low-income senior citizens and physically handicapped residents (about 77 people in total).

The project could have growth-inducing effects by demonstrating a demand for low-income residential housing in this area. This could thereby encourage similar development on lots currently vacant or occupied by underused buildings in the Chinatown-North Beach area. In that there are a limited number of such sites as this available in the area or in the City, and limited funding available for subsidized elderly housing, it is unlikely that the project would encourage further development of this type.

C. MITIGATION MEASURES

Major mitigation measures included in the proposed project are listed below:

- The project sponsor and construction contractor would meet with, and follow the recommendations of, the Traffic Engineering Division of the Bureau of Engineering of the Department of Public Works, the Fire Department, MUNI, and the Department of City Planning to determine feasible traffic mitigation measures to reduce traffic congestion during construction of the project. These would include times at which to close lanes in the Broadway Tunnel, and the method for diverting traffic from two lanes to one, and warning signs placed at key decision points in order to divert motorists to alternative routes.

- The construction contract would require that the project contractor muffle and shield intakes and exhausts, shroud or shield impact tools, and use electric-powered rather than diesel-powered construction equipment, as feasible, so that noise would not exceed limits stated in the City's Noise Ordinance (Article 29, of the San Francisco Police Code).

- The project sponsor would require the general contractor to limit the hours of construction to those from 9 a.m. to 6 p.m., Monday through Friday, to reduce noise impacts on nearby residential and church land uses. Construction also would not be scheduled between 11:30 and 1:30 p.m. on holy days of the Catholic Church calendar.

- The project sponsor would require the general contractor to test for vibrations at the Church facade due to operation of impact tools. Such pre-construction testing would determine whether there would be a need for further study of construction-generated vibration. If necessary, such a study would be undertaken by the project sponsor to identify measures to protect the frescoes within the church.

- Prior to the start of any construction activity the Department of Public Works would monitor CO concentrations (along the entire length of the tunnel) daily (including measurements taken during the p.m. peak hour), for a period of not less than 45 days. Once the slab base of the project were in place (closing off the opening), the Department of Public Works would undertake another monitoring program to last for a similar period of time as the first. If comparison of the two sets of data from the two monitoring programs revealed that closing off the tunnel opening had substantially increased CO concentrations in the tunnel, or caused any violation of any air quality standard where none now exists, the project sponsor and the Department of Public Works would discuss implementation of appropriate mitigation measures such as construction of a wall along the center line of the tunnel (to separate north and south tubes) from the project site to the eastern end of the tunnel beyond the City District Health Center No. 4, and/or placing a new fan at the eastern end of the northern tube (westbound) to assist in tunnel ventilation. The final determination on implementation (and payment for) this mitigation shall be made in consultation with the City Attorney and the Department of Public Works.

D. ALTERNATIVES

NO PROJECT ALTERNATIVE

Environmental characteristics of this alternative would be the same as with current conditions. The air-space over the Broadway Tunnel would not be occupied with the project. This alternative would preserve the option to develop a similar type of building or other alternative uses on the site in the future.

PUBLIC PARK ALTERNATIVE

A public park of about 10,640 gsf, in a series of outdoor terraces, stepped back and up in height from Mason St. (east) to the ventilation structure adjacent to the site (west).

Transportation, noise and air quality effects associated with construction of the park would be similar but of shorter duration to those of the project. Transportation effects resulting from with operation of a park could be less than the project, while effects on air quality resulting from development of air-rights over the Broadway tunnel would be the same as with the project. This alternative would not block any views and would not be visible beyond the immediate site vicinity, and it would result in no new shadow on streets and sidewalks in the area.

● REDUCED DENSITY ALTERNATIVES

● CODE CONFORMING REAR YARD VARIANT

A four-story residential building containing 35 residential units (35 less than the project), about 1,700 gsf of lounge area (3,500 gsf less than the project); no senior dining hall space; no office space; and seven less parking spaces (five less than the project). Required open space (3,724 gsf) would be on a double-level private rear yard; the building would not include public open space as would the project. The building would be 40-ft.-tall and would not include setbacks.

This alternative would not require a zoning re-classification, would not require Conditional Use (CU) authorization for exceeding 40 ft. in height, or for a senior community center, in an R-District, as would the project. This alternative would not require an exception to rear-yard requirements or a variance to parking requirements. The alternative would require a variance to side setback requirements, as would the project.

The alternative would block views of Our Lady Guadalupe Church from a longer stretch of Mason St. than the project, because it would not be setback from the property line at Mason St. as would the project. This alternative would provide housing for 40 people compared to 77 with the project. Transportation effects would be about 50% less than the project; construction noise effects would be less prolonged than with the project. Air quality effects would be similar to those of the project.

- REAR YARD VARIANCE REQUIRED VARIANT

As under Alternative C1 (Code Conforming Rear Yard), this alternative would consist of a 40-ft.-tall, four-story residential building containing 35 residential units compared to 70 units with the project; about 1,700 gsf of lounge area (3,500 gsf less than the project); no senior dining center; no office space; and seven parking spaces (five less than the project). All required open space (3,724 gsf) would be in a public plaza fronting the intersection of Mason St. and Upper Broadway.

As under Alternative C1, this alternative would not require a zoning reclassification, would not require Conditional Use authorization for exceeding 40 ft. in height, or for a senior community center, in an R-District, and would not require a variance to parking requirements. This alternative would require a variance to rear-yard setback and side setback requirements, as would the project.

This alternative would provide housing for 40 people compared to 77 with the project. Construction noise and vibration, and energy effects would be about 25% less than the project; land use, transportation, and growth inducing effects would be less than the project. Air quality effects would be similar to those of the project. This alternative would block views of Our Lady of Guadalupe Church from a shorter length along Mason St. than the project, and would result in less shadow effects on the Church and on adjacent streets and sidewalks, because of its shorter overall height.

EXPANDED SITE ALTERNATIVE

This alternative would consist of two, four-story residential buildings, containing a total of 70 residential units as with the project. The site would include air space over the Broadway tunnel and Lot 42, as with the project, and would also include Lot 1 of Assessor's Block 158 (1,975 gsf) immediately south of Lot 42. This alternative would also include the same social lounge, office, and dining hall space (about 4,700 gsf) as the project, and would include the same amount of residential parking (12 spaces) as the project. This alternative would include an additional 5,773 gsf (18 spaces) of replacement parking for Alfred's Restaurant (the same amount now located on Lot 1). This alternative would not include any public open space.

The buildings would each be 48 ft. tall, and would require Conditional Use (CU) authorization for exceeding 40 ft. in height, and for a senior community center use, in an R district, as would the project. Conditional Use authorization would be required for the replacement parking for Alfred's Restaurant with this alternative. This alternative would require a zoning re-classification of the site (air-space, Lot 42 and Lot 1), to RM-3 compared to RM-4 with the project. As with the project, variance from rear-yard requirements and from the requirement that required windows face a 25 ft. wide open area would be required for this alternative.

This alternative would be built to property lines at Mason St. and Upper Broadway, and would block views of Our Lady of Guadalupe Church from a longer stretch of Mason St. than the project. Housing for 77 people would be provided under this alternative as with the project. Transportation, noise and air quality effects associated with construction would be similar, but of longer duration, to those of the project. Transportation and air quality effects resulting from project operation would be as for the project.

NO SENIOR DINING CENTER ALTERNATIVE

This alternative would contain a 600 gsf senior lounge compared to a 4,700 gsf senior center, with dining/multi-purpose room and warming kitchen, with the project. This alternative would contain 14 off-street parking spaces compared to 12 off-street parking spaces with the project. The number of residential units (70) would be the same under this alternative as with the project. The building would be 58-ft.-tall as with the project, but would have a partial sixth floor set back from Mason St.

This alternative would require a rezoning classification, would require Conditional Use authorization for exceeding 40 ft. in height in an R-District, and would require variances from rear-yard setback and side setback requirements, as would the project. This alternative would not require Conditional Use authorization for a senior community center in an R-District, and would not require a variance to parking requirements, compared to the project.

Transportation effects would be about 55% less, and loading effects would be almost eliminated, compared to the project. Effects on parking would be less with two more spaces provided. Construction noise and vibration effects would be less prolonged than with the project. Air quality, shadowing, and growth inducing effects would be the same as with the project. This alternative would block views of Our Lady of Guadalupe Church to a lesser extent, though along the same length of Mason St., compared to the project.

● CODE-REQUIRED PARKING ON-SITE ALTERNATIVE

This alternative would have 14 parking spaces on-site compared to 12 on-site spaces with the project; all other uses, building dimensions, and floor areas of this alternative would be the same as the proposed project.

This alternative would not require a variance to parking requirements; all other approval requirements would be as with the project. Parking impacts could be slightly less than the project with two additional off-street spaces provided. All other impacts of this alternative would be as for the project.

II. PROJECT DESCRIPTION

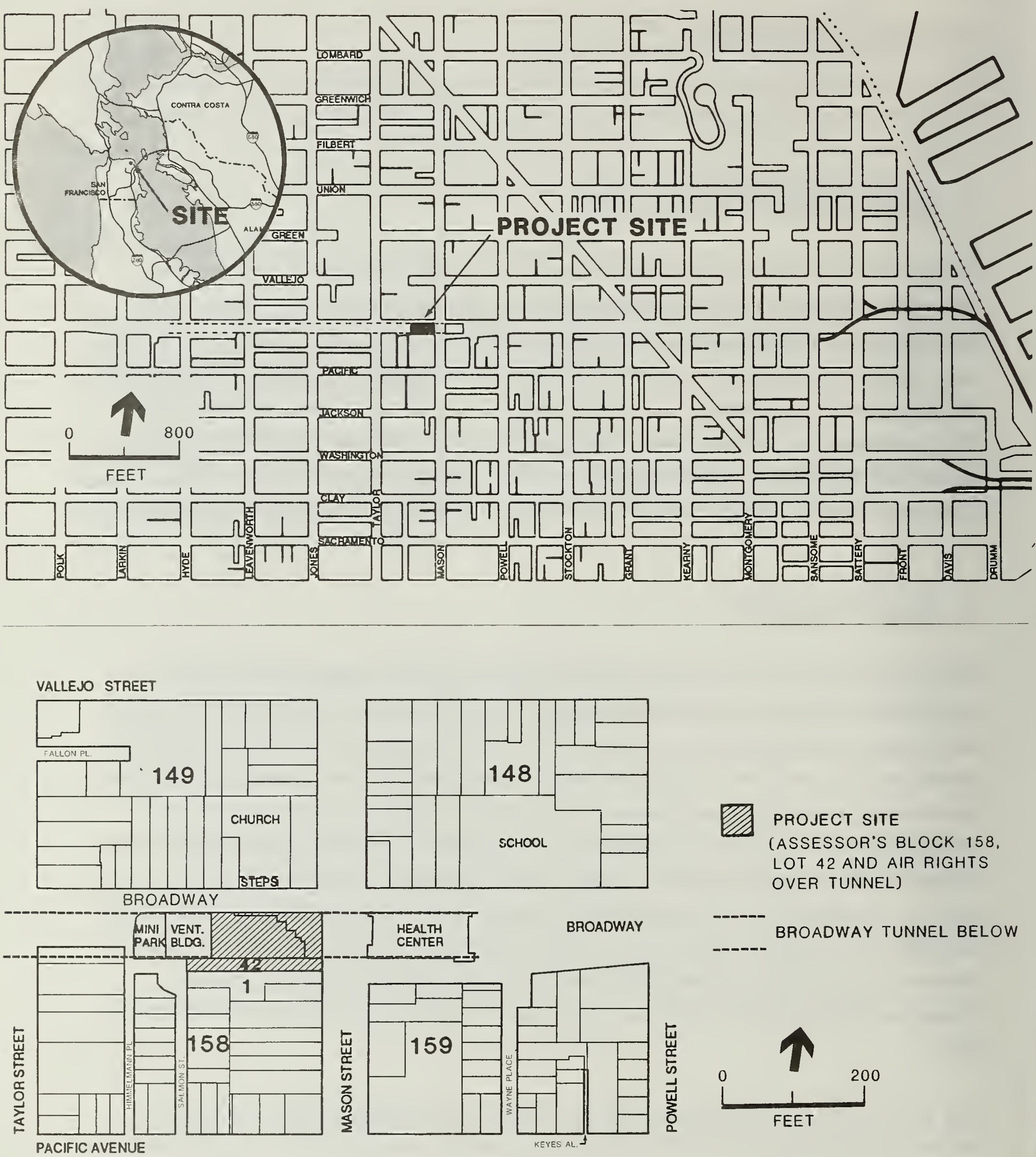
A. PROJECT SPONSOR'S OBJECTIVES

Pineview Housing Corporation proposes to construct a six-story, 58-ft.-tall building containing 69 apartments for low-income seniors and the physically handicapped, one apartment for a manager and a community center for senior citizens. Construction and rents would be subsidized by the federal government Housing and Urban Development's (HUD) Section 8/202 program. The project architect is Gordon Chong and Associates. The project sponsor's objectives are to develop quality residential space affordable for seniors and the physically handicapped on limited incomes, and to provide a senior community center, on an unused site in the area of San Francisco's traditional Chinatown.

B. PROJECT LOCATION

The project site is air-space over the Broadway Tunnel public right-of-way, at the intersection of Mason St. and Broadway, and Lot 42 of Assessor's Block 158, in the City and County of San Francisco (see Figure 1, p. 10). One block east of the site, Broadway divides into two portions: one portion passes through the Broadway Tunnel, and the other portion (referred to as Upper Broadway in this report) climbs upward to Russian Hill passing along the northern edge of the site. The project would occupy air space over the tunnel (10,640 gsf), and would also include Lot 42 of Assessor's Block 158 (10 ft. x 197.5 ft. = 1,975 gsf) a city-owned utility easement which would be used as a light and air easement for the project. The 12,615-gsf site fronts Mason St. on the east and Upper Broadway on the north. Across Upper Broadway from the site is the Our Lady of Guadalupe Church. East of the site, across Mason St. is the City District Health Center No. 4.

The site is in an RM-2 (Residential Mixed, Moderate Density) use district and a 65-A Height and Bulk District in which the maximum allowable height is 65 ft. Conditional Use



● FIGURE 1
PROJECT LOCATION
PINEVIEW

SOURCE: ESA

authorization is required for any structure which exceeds 40 ft.in height in an R-District. In an A-Bulk district, the maximum length and maximum diagonal dimensions are 110 ft. and 125 ft., respectively.

C. PROJECT CHARACTERISTICS

Project characteristics are summarized in Table 1. The 58-ft.-tall project would be a six-story building, containing about 36,100 gsf of floor area, excluding outdoor terrace area on upper floors and parking space. A six-foot tall elevator over-ride would be located atop the structure. The proposed 70 residential units would result in a residential unit density of one unit per 180 gsf of site area. Pedestrian and vehicular access to the building would be from a ground-floor plaza, which would front Mason St. and Upper Broadway. The ground-floor would contain a lobby, a social lounge area, an office for visiting medical and social workers, and parking; the second floor would contain a dining/multi-purpose room, a warming kitchen, and two apartments; floors three through six would contain apartments. There would be an outdoor terrace on each of the third, fifth, and sixth floors.

The building would include about 30,900 gsf of residential space (70 units); about 4,700 gsf of space in a senior center (including social lounge, dining/multi-purpose room, and warming kitchen); about 500 gsf of office space (for visiting social and medical workers); and about 3,400 gsf of on-site parking space (12 spaces). The project would provide open space on-site in the form of a 2,685 gsf outdoor public plaza fronting the corner of Mason St. and Upper Broadway, and three private upper-floor outdoor terraces containing a total of about 800 gsf. The building management of Pineview Housing Corporation, the project sponsor, would be responsible for maintenance of the outdoor plaza.

Pedestrian access to the building would be on Mason and Upper Broadway. Vehicular access would be from Upper Broadway to ten enclosed parking spaces on the rear of the ground floor of the building. Two additional spaces would be located along Broadway by the garage entrance.

The proposed building would be set back from the corner of Mason St. and Upper Broadway; a landscaped outdoor plaza would be located on the ground floor, within this set back area (see Figure 4, p. 16).

● TABLE 1: PROJECT CHARACTERISTICS

HEIGHT AND BULK MEASUREMENTS

	Proposed Project	Allowable in 65A Height and Bulk District
Height:	58	65
Length:	85 /a/	110 /a/
Diagonal:	109 /a/	125 /a/

SITE SIZE: 12,615 gsf

COMPARISON OF RM-2 AND RM-4 ZONING CLASSIFICATIONS

Zoning District	Basic Density	Maximum Permitted Non-Elderly/ Handicapped Units /b/ On The Site	Bonus Density /c/	Maximum Permitted Elderly/ Handicapped Units /d/ On The Site	Units In Project
RM-2	1:600	21	1:300	42	0
RM-4	1:200	63 85 (efficiency) units /e/	1:100	126	70

PROPOSED FLOOR AREAS

Senior Lounge, Dining Hall and Kitchen, and Lobby/Circulation	4,700
Office	500
Parking	3,400 (12 spaces)
Residential	30,900 (70 units)
Public Open Space	2,685
Private Open Space	800
TOTAL	42,985

/a/ Above height of 40 ft.

/b/ The parking requirement under Section 151 of the City Planning Code would be one space for each dwelling unit.

/c/ Under Section 209.1(m) of the City Planning Code, an increase of up to 100% of the basic allowable number of residential units is allowed for residential developments designed for and occupied by senior citizens or the physically handicapped.

/d/ The parking requirement for dwelling units as defined by Section 209.1(m) is one-fifth the number otherwise required in the district in which the units are located.

/e/ Section 209.1(e) of the City Planning Code permits units containing no more than 500 square feet of net floor area to be counted as equal to three-fourths of a dwelling unit in the RM-4 districts.

SOURCE: City Planning Code; Gordon Chong and Associates; and ESA

The project would be set back from Mason St. by about 12 ft. at each of the third, fifth, and sixth floors. At each of these set backs, there would be an outdoor terrace. Elevations and floor plans are shown in Figures 2 to 6, pp. 14 to 18.

D. PROJECT SCHEDULE, COST AND APPROVAL REQUIREMENTS

SCHEDULE

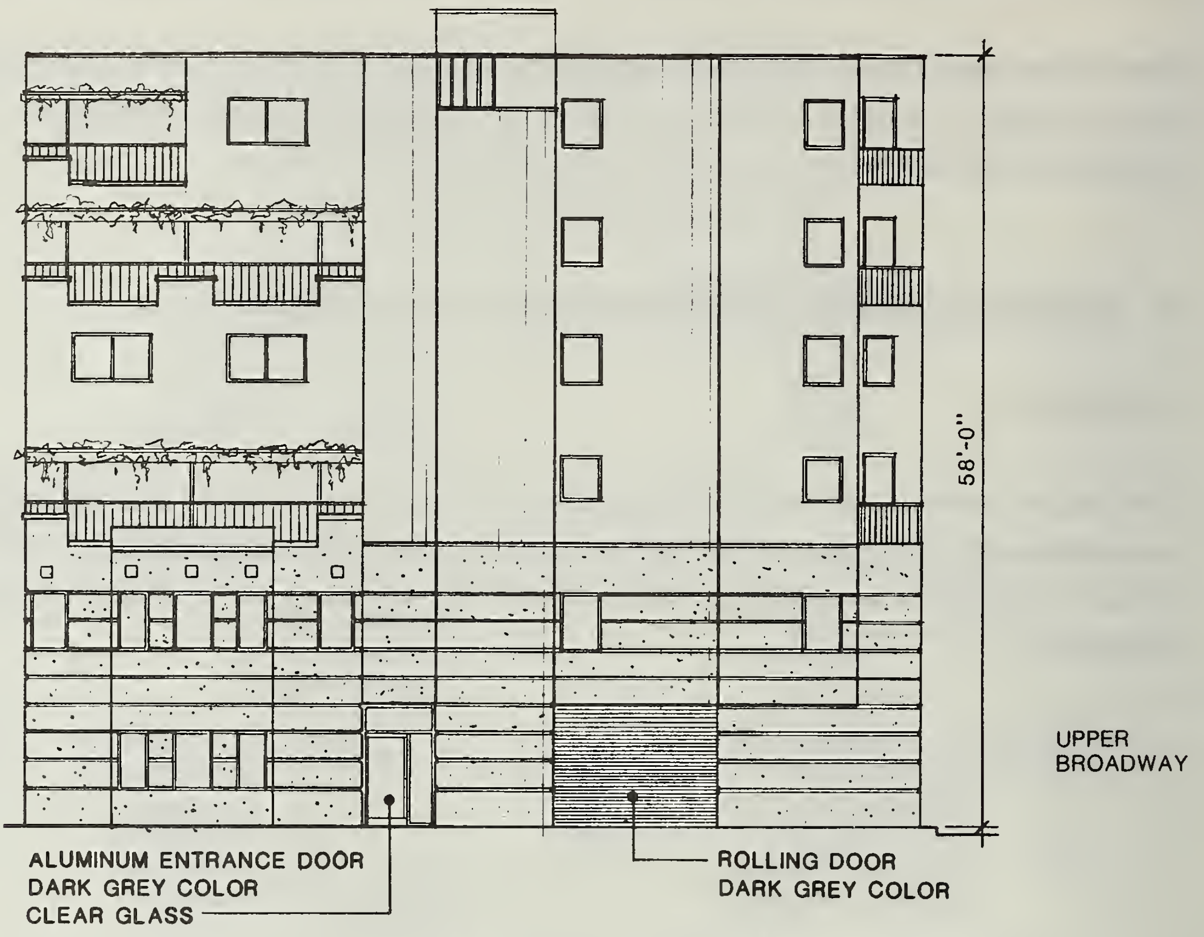
The project sponsor expects environmental review, project review and detailed design to be completed in the spring of 1987. If the project were approved and building permits issued, construction would take about 14 months. Construction periods are projected as follows:/1/

Site Preparation	6 weeks
Foundation	12 weeks
Building Platform	12 weeks
Steel Erection	8 weeks
Exterior Finishing	12 weeks
Interior Finishing	16 weeks

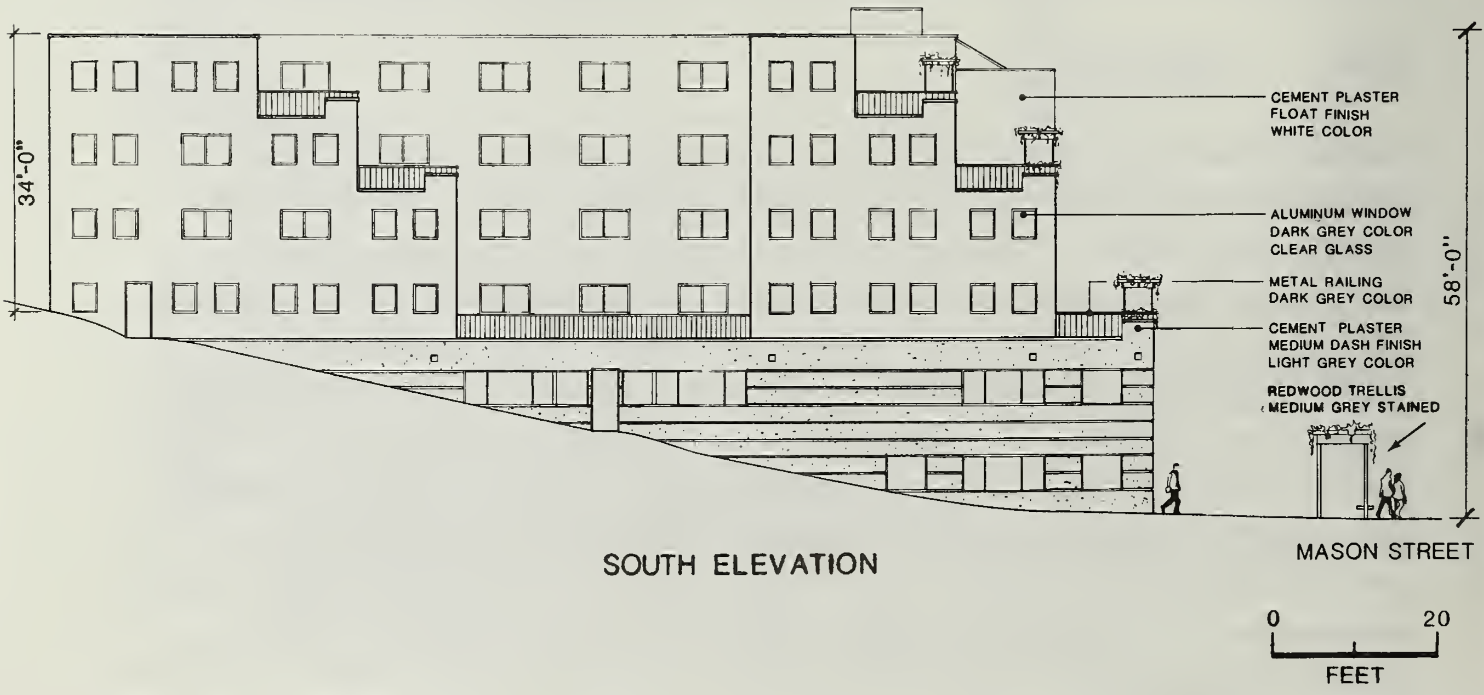
Initial occupancy would occur about 14 months from the start of site preparation.

COST

Estimated construction cost of the project would be about $4.6 million (1986 dollars), including site preparation, building shell and interior improvements. Replacement cost for the entire building, including architectural and engineering fees, would be about $5.1 million. The project sponsor would receive a Section 8/202 low interest mortgage of $3.6 million from the United States Department of Housing and Urban Development (HUD); $750,000 from the San Francisco Office Affordable Housing Production Program (OAHPP) and $250,000 for the construction of the Senior Center from the Senior Center Bond Act (State of California). Under HUD guidelines, tenants' rent payments would be limited to 30% of their income, with a monthly subsidy from HUD providing the difference between the rental fees paid by the tenants and the fair market rents authorized by HUD. The project sponsor would lease air rights from the City for a nominal annual sum.



EAST (MASON STREET) ELEVATION



SOUTH ELEVATION

FIGURE 2
PROJECT ELEVATIONS
PINEVIEW

SOURCE: GORDON CHONG AND ASSOCIATES

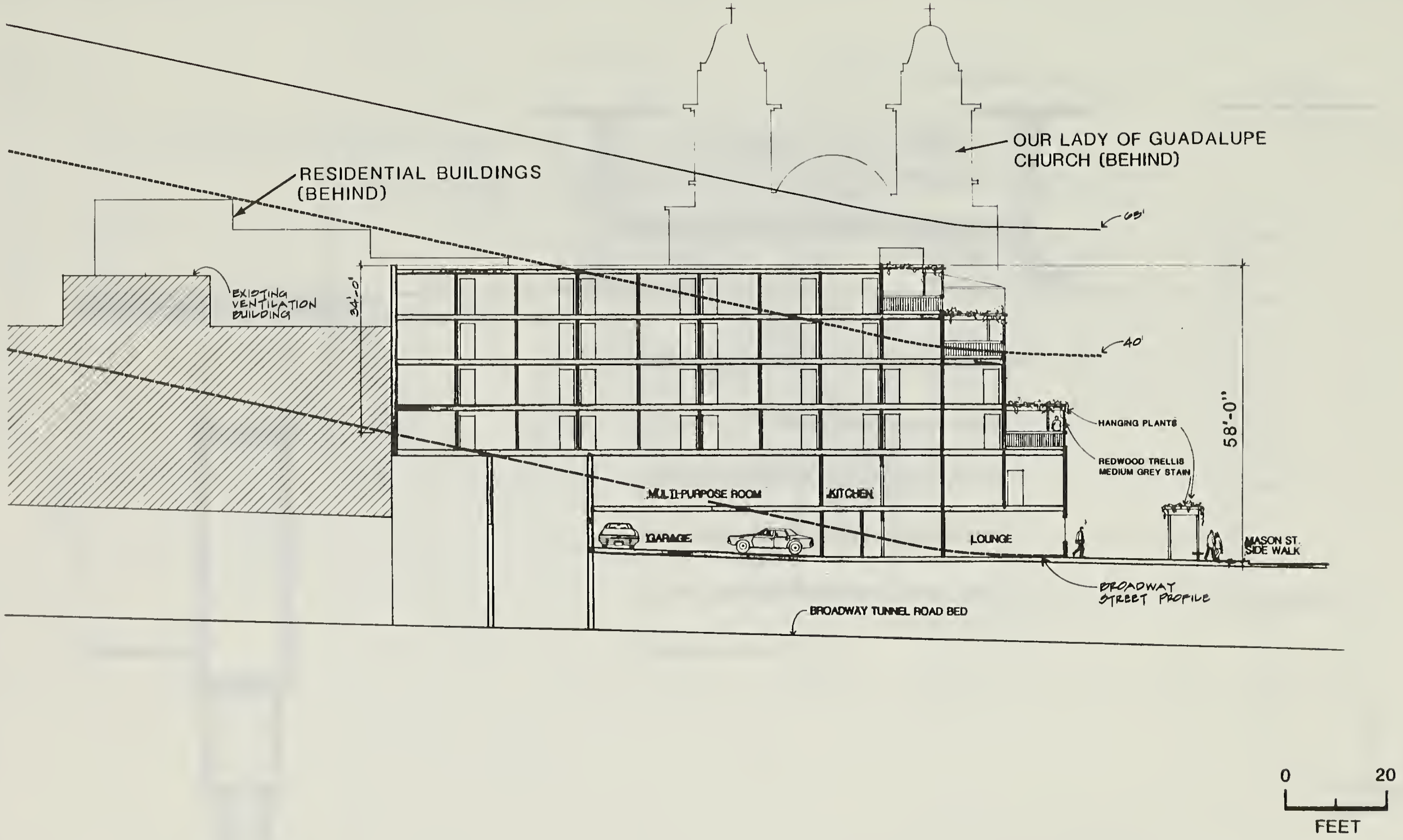
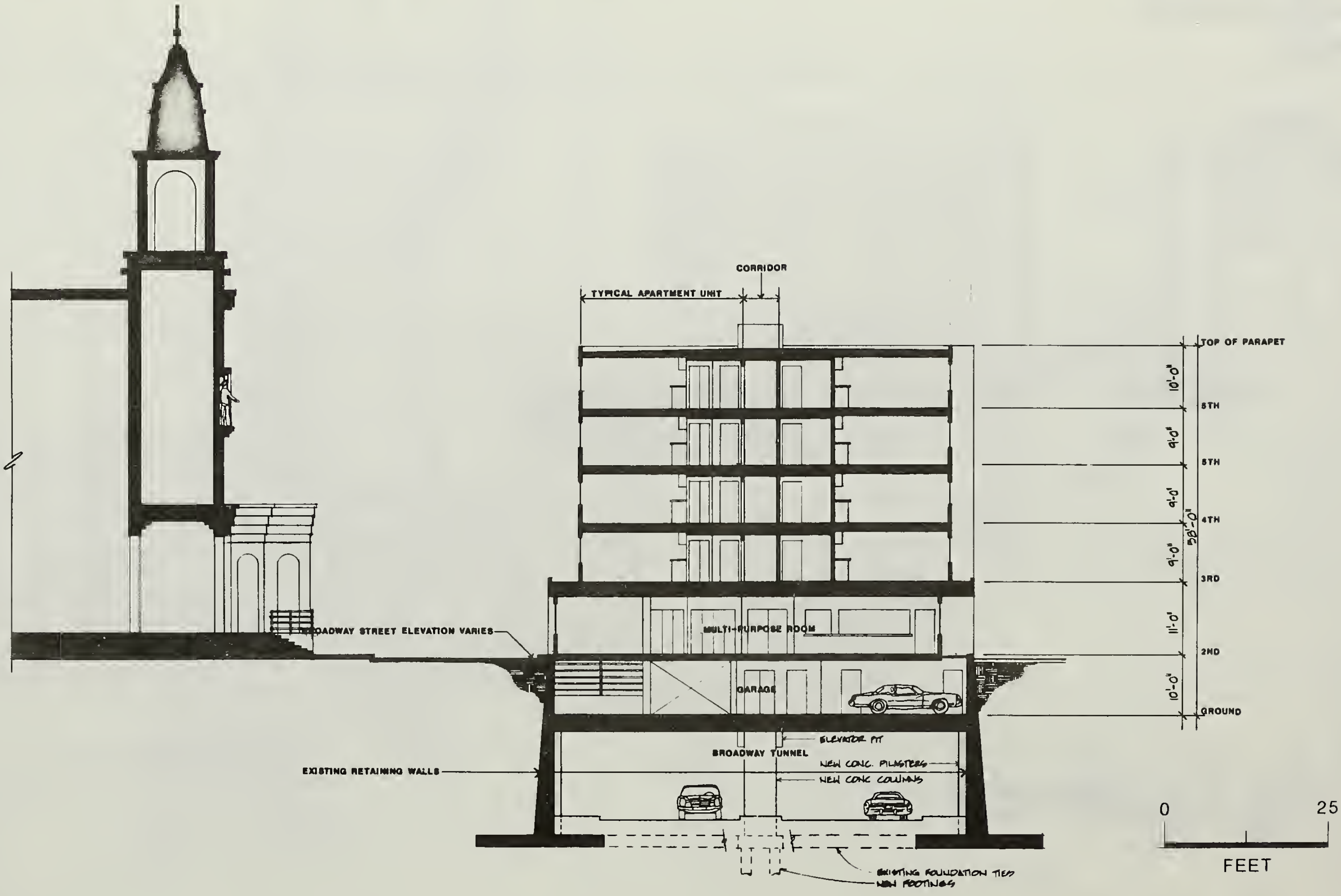


FIGURE 3
BUILDING SECTION
PINEVIEW

SOURCE: GORDON CHONG AND ASSOCIATES



● FIGURE 3a
BUILDING SECTION OF PINEVIEW
AND OUR LADY OF GUADALUPE CHURCH (LOOKING EAST)

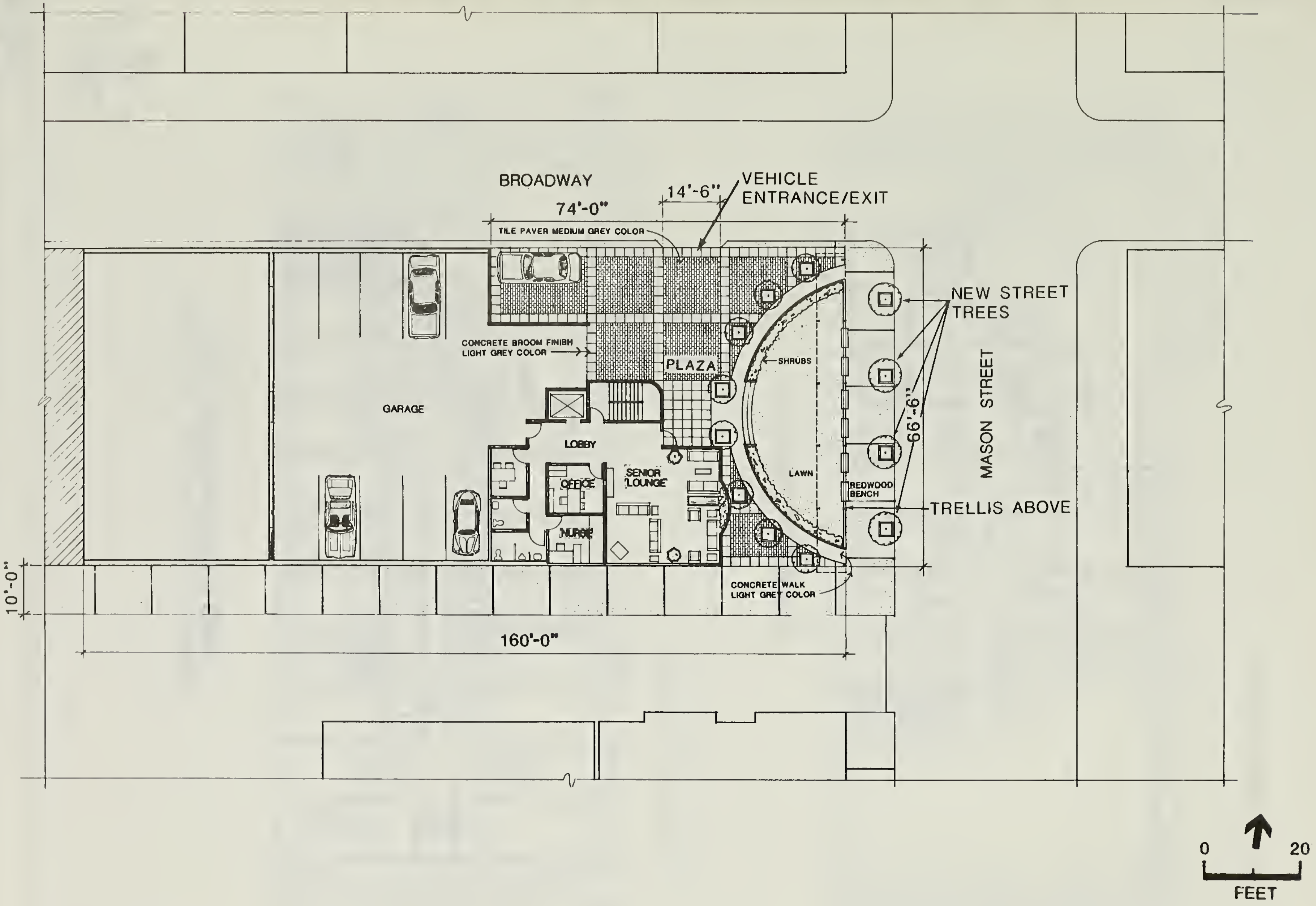
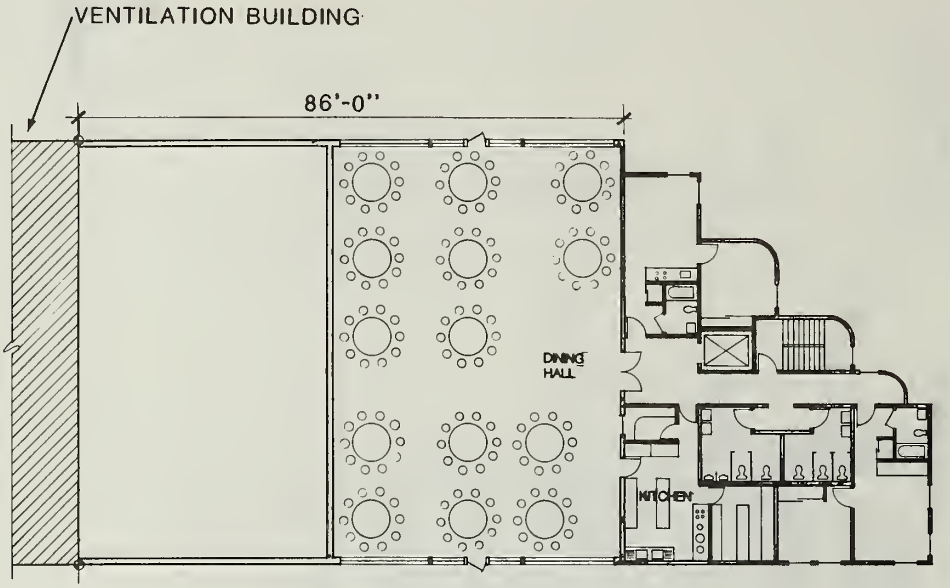
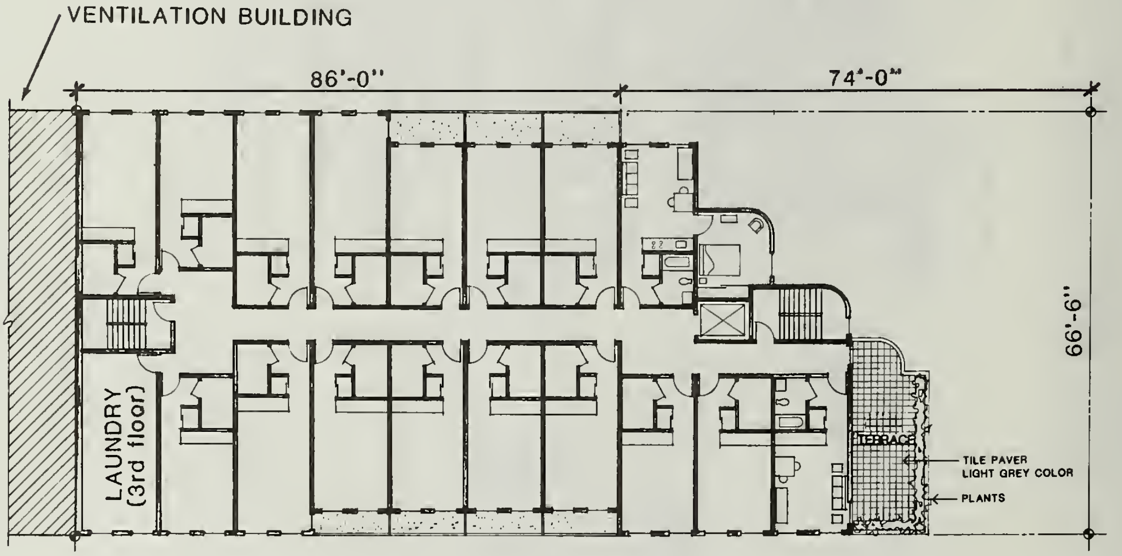


FIGURE 4
GROUND FLOOR PLAN
PINEVIEW

SOURCE: GORDON CHONG AND ASSOCIATES



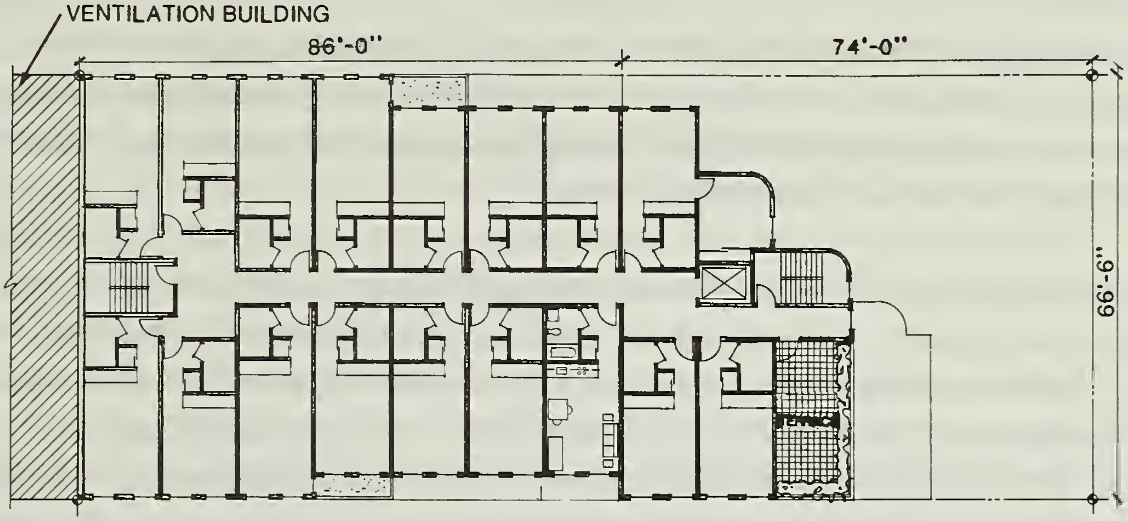
SECOND FLOOR PLAN



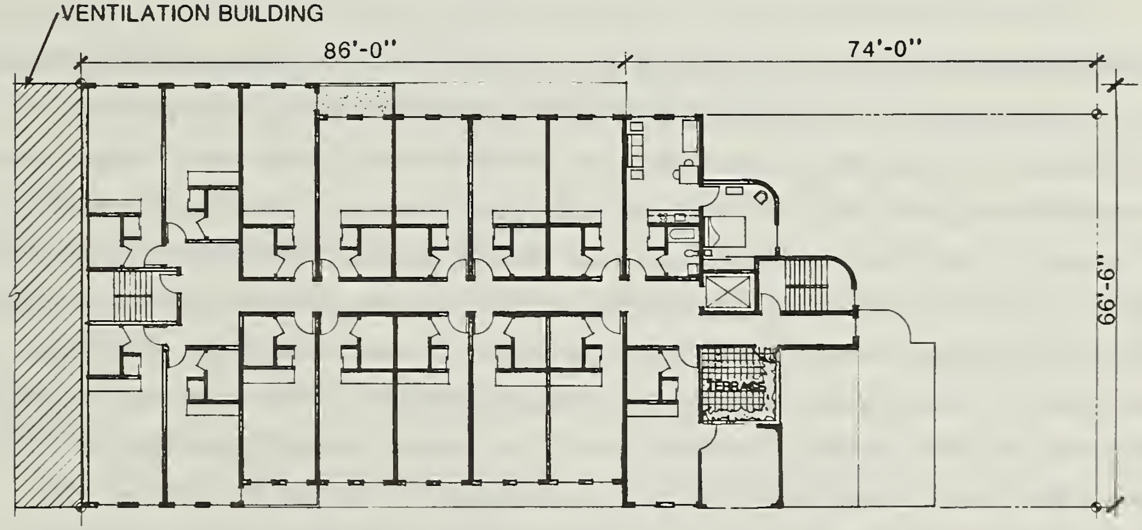
THIRD & FOURTH FLOOR PLAN
(FOURTH FLOOR HAS NO TERRACE)

FIGURE 5
SECOND, THIRD AND FOURTH FLOOR PLANS
PINEVIEW

SOURCE: GORDON CHONG AND ASSOCIATES



FIFTH FLOOR PLAN



SIXTH FLOOR PLAN

FIGURE 6
FIFTH AND SIXTH FLOOR PLANS
PINEVIEW

SOURCE: GORDON CHONG AND ASSOCIATES

APPROVAL REQUIREMENTS

Following a public hearing before the City Planning Commission on the Draft EIR, responses to written and oral comments will be prepared. The EIR will be revised as appropriate and presented to the City Planning Commission for certification. No permits may be issued before the final EIR is certified.

- The project sponsor would request a zoning reclassification from RM-2 to RM-4. The project would require Conditional Use authorization under Section 303 of the City Planning Code for exceeding 40 ft. in height in an R-District (Section 253) , for the senior community center in an R-District (Section 209.4(a)). The project would require a variance under Section 305 for not providing the required rear-yard (Section 134) and for not providing the required number of off-street parking spaces (Section 151). Because apartments with windows on the south facade would not face a rear yard or a public right-of-way of 25 ft. in width, the project would require a variance from Section 140 of the City Planning Code. The project would also require approval from the United States Department of Housing and Urban Development (HUD).

- The project would require a street space permit from the Department of Public Works in order to close a portion of Broadway during portions of the construction period. Development of the project on air rights over the Broadway Tunnel would require vacation of a portion of a public right-of-way, and subsequent leasing to Pineview Corporation. The required steps, following certification of the EIR by the City Planning Commission, would be: 1) the City Planning Commission would determine whether the action conforms to the City's Master Plan; 2) the recommendation on the action would be forwarded to the Department of Public Works, Surveys and Mapping Division; 3) following approval by the Department of Public Works, the action would be referred to the Department of Real Estate, which would subsequently prepare a resolution to vacate air-rights; 4) the recommendation and resolution on the action would be forwarded to the appropriate committee of the Board of Supervisors; 5) the Board of Supervisors committee would hold a hearing on the action and on the proposed rezoning; 6) two full Board of Supervisors readings on the proposal would be held; 7) the terms of the requested lease would be negotiated between the sponsor (Pineview Corporation), the Department of Real Estate and the Mayor's Office of Housing and Economic Development (MOHED). (HUD requires a lease term of at least 40 years.)

- On November 14, 1986 the voters of San Francisco passed Proposition M, the Accountable Planning Initiative. Proposition M established eight Priority Policies. These policies are: preservation and enhancement of neighborhood-serving retail uses; protection of neighborhood character; preservation and enhancement of affordable housing; discouragement of commuter automobiles; protection of industrial and service land uses from commercial office development and enhancement of resident employment and business ownership; earthquake preparedness; landmark and historic building preservation; and protection of open space. Prior to issuing a permit for any project which requires an Initial Study under CEQA or adopting any zoning ordinance or development agreement, the City is required to find that the proposed project or legislation is consistent with the Priority Policies. The City Planning Commission, in its decision regarding the proposed project approval or disapproval would make a determination of the project's conformance with the Priority Policies.

The City Planning Commission would hold a public hearing to consider the project's application for a zoning redesignation and Conditional Use authorization in accordance with Section 303 of the City Planning Code, and adopt a motion recommending either approval, approval with conditions, or disapproval of the project. A public hearing would be held before the Board of Supervisors on the zoning reclassification. If the zoning reclassification were approved by the Board of Supervisors, the Mayor's signature would be needed to place the reclassification into law within 30 days. The Zoning Administrator would hold a hearing to consider the requested variances, in accordance with Section 305 of the City Planning Code. Pending project approval by the City Planning Commission and the Board of Supervisors, the project sponsor must obtain building and related permits from the Central Permit Bureau of the Department of Public Works. As of November 1986, no applications for site permits for the project have been filed with the Central Permit Bureau.

NOTE - Project Description

/1/ Robert Yee, Pineview Housing Corporation, Memorandum, June 11, 1986.

III. ENVIRONMENTAL SETTING

A. LAND USE AND ZONING

LAND USE

The project site, which is air-space over the Broadway Tunnel and a City-owned lot, is currently vacant. The City lot contains a 12-inch sewer main and must remain unbuilt upon, to allow for sewer maintenance. It is currently used by customers of Alfred's restaurant for vehicular access to the adjoining lot, which is operated by the restaurant as a private parking facility for their customers.

The project site is located on the lower slopes of the eastern side of Russian Hill, on the edge of San Francisco's traditional Chinatown area. Chinatown generally encompasses the area between Vallejo St. on the north, extending to California St. on the south, between Stockton to Powell Sts. on the west and Kearny St. and Columbus Ave. to the east. The project site is located at the southwest corner of the intersection of Mason St. and Upper Broadway. Mason St. is a transitional border between the more varied and intensive land uses to the east in the Broadway/North Beach commercial area and Chinatown, and the less varied and less intensely developed Russian Hill residential area to the west and northwest.

Existing land uses in the project vicinity are shown in Figure 7, p. 22. Immediately north of the site across Upper Broadway is the Our Lady of Guadalupe Church, a Catholic church which seats about 250 persons. To the northeast, at 886 Broadway, is Alfred's Restaurant. About one-half block east of the site, on the north side of Broadway, is the Jean Parker Elementary School. Immediately east of the site, across Mason St., is the City District Health Center No. 4, which provides health services to primarily low- and moderate-income clients. To the south, on the eastern side of Mason St. are residential uses, an Episcopal Church, and the 990 Pacific Ave. building (a 92 unit apartment building for the elderly owned and operated by the San Francisco Housing Authority). The western side of Mason St. is entirely residential, developed with two- and three-family flats and

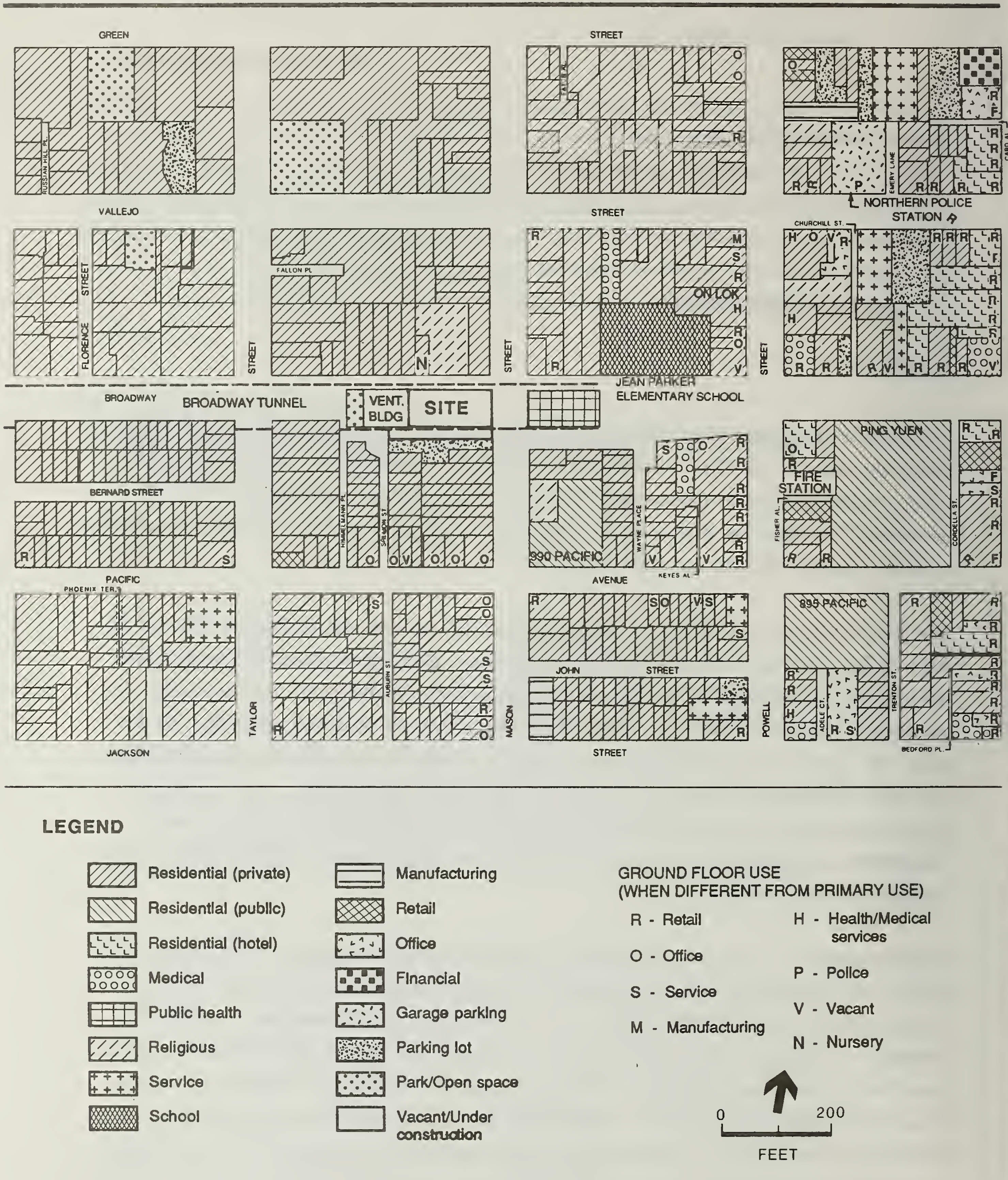


FIGURE 7
EXISTING LAND USES
PINEVIEW

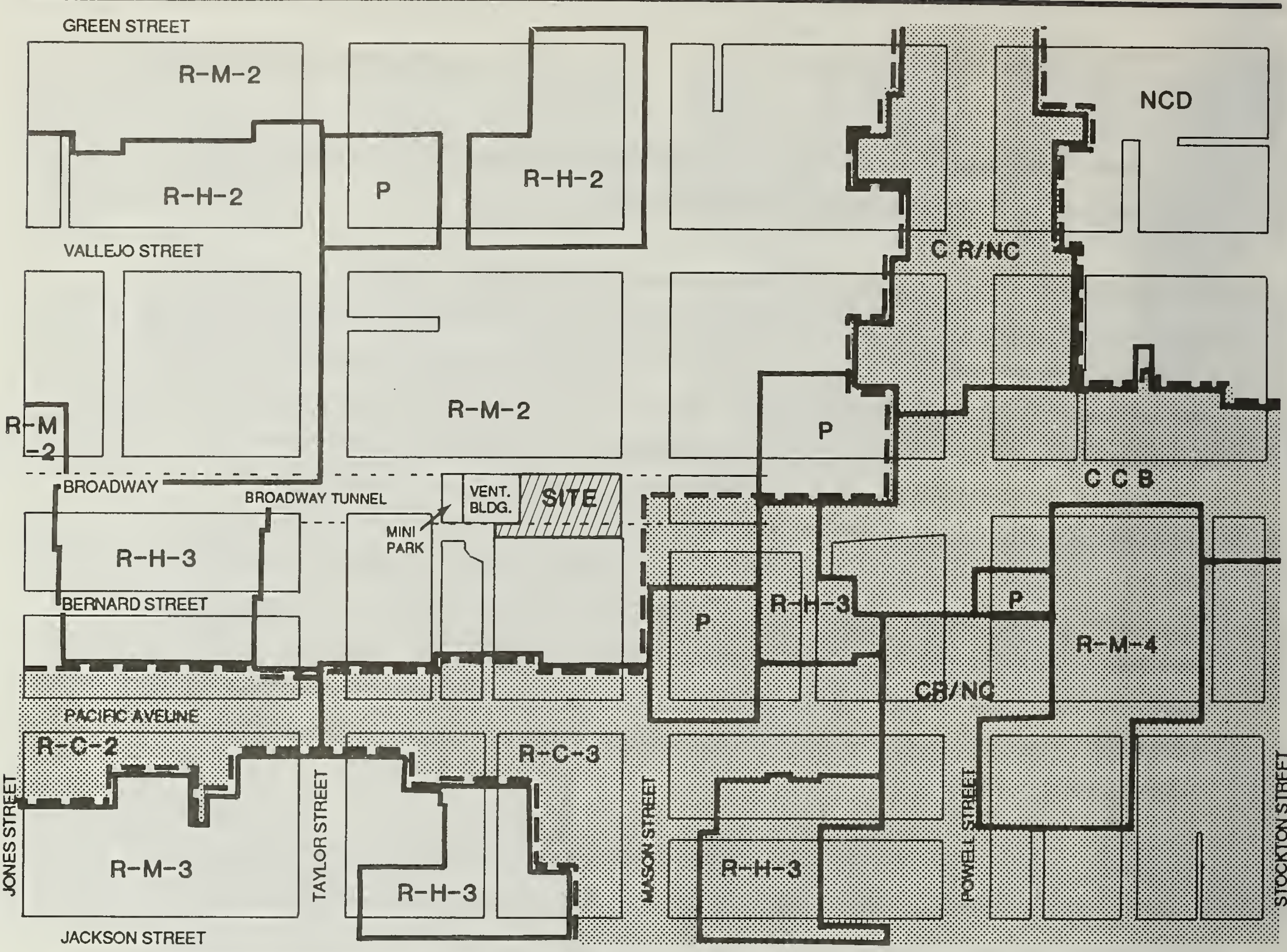
four- to six-story apartment buildings. To the west, the Russian Hill neighborhood is generally one- and two-family residential buildings.

The general character of the neighborhood is moderate density residential. The most common land use within one to two blocks of the site is two-and three-family residential buildings, interspersed with six- to twelve-unit apartment buildings. Ground-floor retail uses in the site vicinity are located along Powell St. between Pacific and Vallejo Sts. and along Broadway, east of Powell St. The retail uses are primarily oriented towards residents of the surrounding area, and include grocery stores, hair stylists, and Chinese-language video rental outlets. Some of the store fronts along Pacific Ave. contain offices for neighborhood service organizations. Along Stockton St., about two blocks east of the site, the residential and commercial density is greater than in the immediate site vicinity. Along Stockton St., residential hotels and apartment buildings which contain ten or more units with ground-floor retail establishments and banks are the predominant uses. The retail stores along Stockton St. are primarily oriented toward specialty food markets.

Northwest of the site on Russian Hill, highrise apartment buildings within two blocks of the site include a 30-story apartment building at 857 Green St. (Royal Towers), and a 25-story apartment building at 999 Green St. The San Francisco Housing Authority operates three residential buildings in the project vicinity: 775 Broadway (Ping Yuen), 11-stories-tall, containing 194 apartments for families located about two blocks east of the project site; 895 Pacific Ave., six-stories-tall, containing 60 apartments for families located about two blocks southeast of the site and 990 Pacific Ave. six-stories-tall, containing 92 apartment units for the elderly; located about one-block south of the site. The On-Lok House, a five-story building containing 55 apartments for senior citizens, is located on Powell St. between Broadway and Vallejo St., one block northeast of the site. Health service centers oriented towards seniors are located on the ground floor and basement of On-Lok House, and at 827-31 Broadway between Mason and Powell Sts., one-block east of the site; City District Health Center No. 4 provides health services for the entire community.

ZONING

The project site is in an RM-2 (Residential Mixed, Moderate Density) use district (see Figure 8, p. 24). Development of residential structures containing one to three units,



LEGEND

R-C-2	Residential-Commercial Moderate Density District
R-C-3	Residential-Commercial Medium Density District
R-H-2	Residential Two-Family House District
R-H-3	Residential Three-Family House District
R-M-2	Residential Mixed Moderate Density District
R-M-3	Residential Mixed Medium Density District
R-M-4	Residential Mixed High Density District
P	Public Use District
NCD	Neighborhood Commercial District
CCB	Chinatown Community Business District (Interim Controls)
C R/NC	Chinatown Residential/ Neighborhood Commerical District (Interim Controls)
▩	S.U.D.-G Garment Shop Special Use District
▨	Project Site

0 200
FEET

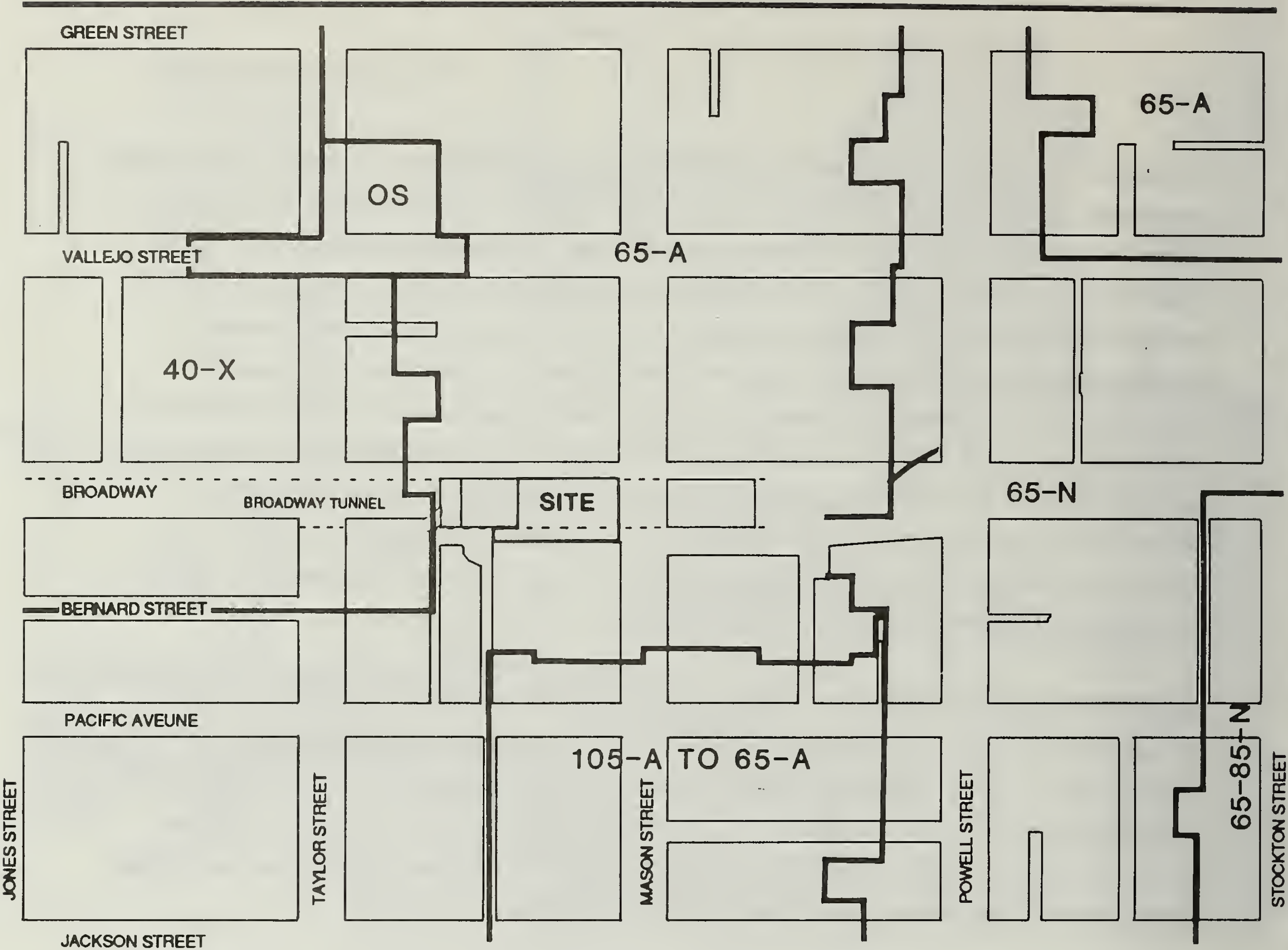
FIGURE 8
EXISTING
PLANNING CODE USE DISTRICTS
PINEVIEW

SOURCE: CITY PLANNING CODE AND CHINATOWN INTERIM CONTROLS as well as group housing and boarding facilities and residential care facilities are principal permitted uses in this zoning district. Under RM-2 zoning, one residential unit per each 600 gsf of lot area is the maximum allowable density. Under Section 209.1(m) of the City Planning Code, an increase of up to 100% of the maximum number of residential units permitted is allowed, provided that dwelling units are designed specifically for and occupied by senior citizens or the physically handicapped. Development of up to 42 residential units for senior citizens or physically handicapped could be permitted for the 12,615 gsf site under RM-2 zoning. Under RM-3 zoning, one residential unit per each 400 gsf of lot area is the maximum allowable density; a maximum of 63 units could be permitted for the site. Under RM-4 zoning, one residential unit per each 200 gsf of lot area is the maximum allowable density. Up to 126 residential units for senior citizens or physically handicapped persons could be permitted on the site under RM-4 zoning.

About one block south of the site, on lots adjacent to Pacific Ave., the zoning is RC-3 (Residential-Commercial Combined, Medium Density); residential development comparable to that allowed in an RM-3 District is permitted, as well as small hotels and ground-floor commercial establishments. Immediately east across Mason St. from the site is the western edge of the Garment Shop Special Use District, wherein garment shops are a permitted use where commercial uses are permitted.

The project site is located about one-half block west of the western boundary of the Chinatown Rezoning Study Area, where interim controls were adopted in July 1986. The interim controls restrict the size and type of commercial establishments which occupy ground floor space and encourage the retention of upper stories for residential space. The interim controls also regulate the size of residential units and require rear-yard usable open space, and establish a maximum allowable height of 65 ft. over most of the area.

The project site is in a 65-A Height and Bulk district, with a maximum allowable height of 65 ft. and a maximum length and maximum diagonal dimension of 110 ft. and 125 ft. respectively, for that portion of a building over 40 ft. in height (see Figure 9, p. 26). Development of a building over 40 ft. in height in an R-District requires Conditional Use authorization (Section 253 of the City Planning Code). Conditional Use authorization is also required for a community facility, such as a senior community center, in an R-District (Section 209.4(a)). Rear-yard setbacks are required in R-Districts, of at least



LEGEND

NUMBERS INDICATE MAXIMUM BUILDING HEIGHT
LETTERS INDICATE BULK DISTRICT

	Height Above Which Maximum Dimensions Apply	Maximum Plan Dimensions (feet) Length	Maximum Plan Dimensions (feet) Diagonal
A	40	110	125
N	40	50	100
X	Bulk limits not applicable		
OS	Open Space		

FIGURE 9
EXISTING
PLANNING CODE
HEIGHT AND BULK DISTRICTS
PINEVIEW

SOURCE: CITY PLANNING CODE AND CHINATOWN INTERIM CONTROLS

45% of the lot depth in an RM-2 District, and 25% of the lot depth in an RM-4 District (Section 134(a(1) and (2)). Front setbacks are also required in R-Districts (Section 132), in an amount based on the front setbacks of adjacent buildings. Also in R, NC, C and M districts, the required windows of each dwelling unit are required to face on to a rear yard or a public right-of-way or sideyard of at least 25 ft. in width (Section 140).

The City Planning Code requires the provision of usable open space, for new residential development. In an RM-2 District, 80 gsf of private open space, or about 106 gsf of common open space (80 gsf x 1.33) per dwelling unit is required; in an RM-4 District, 36 gsf of private open space or about 48 gsf (36 gsf x 1.33) of common open space per dwelling unit is required. For dwellings specifically designed for and occupied by senior citizens or physically handicapped persons the minimum amount of open space to be is reduced to one-half the amount otherwise required.

Off-street parking is required in RM-Districts in the amount of one space per dwelling unit; one space for each five dwelling units is required for housing specifically designed for and occupied by senior citizens or the physically handicapped (Section 151 of the City Planning Code). Off-street freight-loading spaces are not required for residential buildings containing less than 100,000 gsf or for the senior citizen center.

B. URBAN DESIGN

URBAN DESIGN

The project site is air-rights over the Broadway Tunnel, and an adjacent City-owned lot, at the intersection of Broadway and Mason St (see Figure 10 p. 28). There are no structures on the project site; customers of Alfred's Restaurant use the vacant City-owned lot for access to parking on the restaurant's adjoining lot.

Two buildings located within one block west of the site are designated as City landmarks: the Atkinson House (Landmark No. 97), located at 1656 Taylor St; and the House of the Flag (Landmark No. 46), located at 1032 Broadway. Both are residential buildings.

Under contract with the Department of City Planning, the Foundation for San Francisco's Architectural Heritage (Heritage) has recently conducted preliminary ratings of buildings

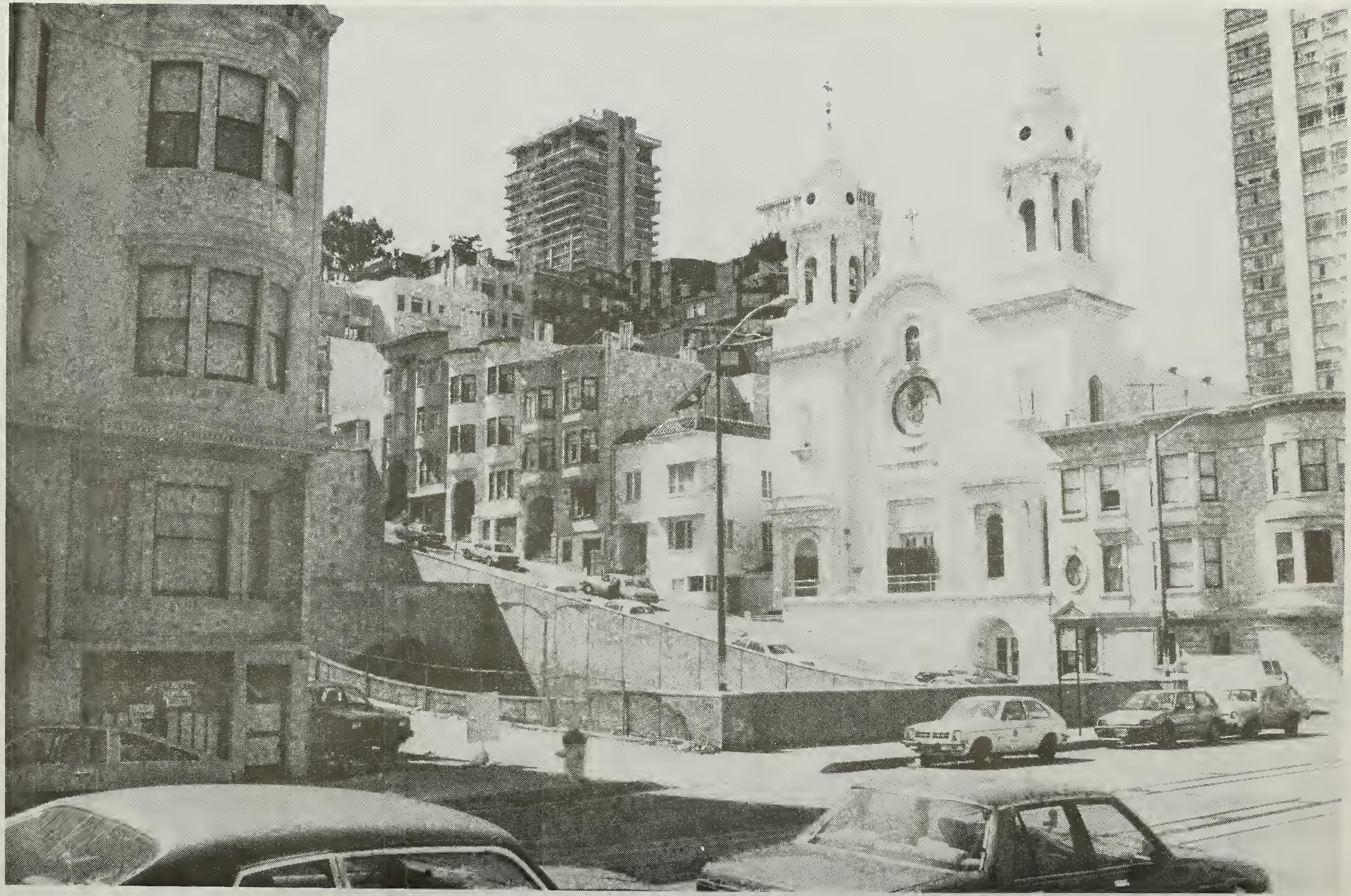


FIGURE 10
PHOTOGRAPH OF SITE FROM MASON STREET
PINEVIEW

SOURCE: ESA

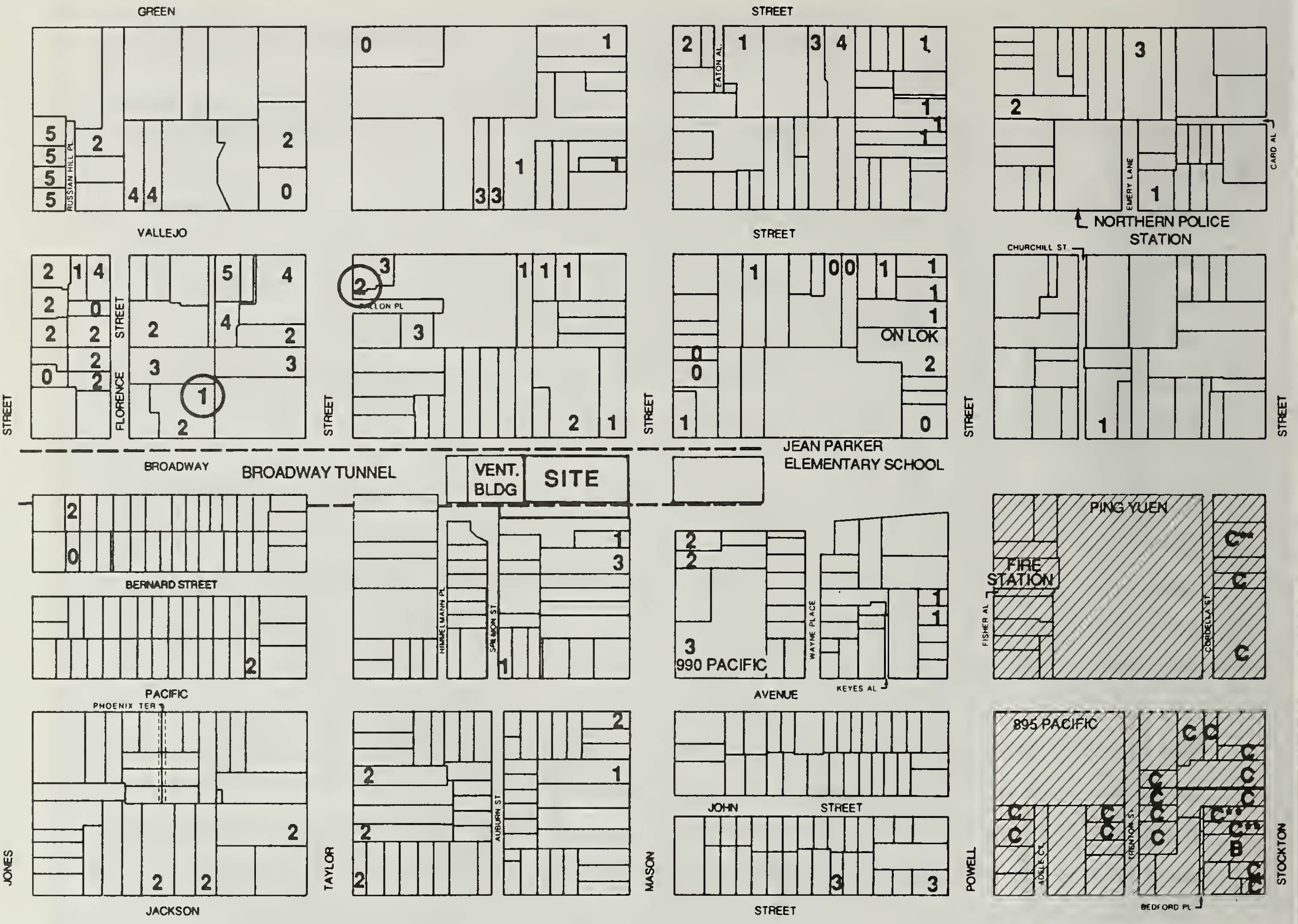
in the outer downtown area, including in the South of Market, Tenderloin, Nob Hill and Chinatown areas. The preliminary survey by Heritage did not include blocks in the site vicinity north of Broadway or west of Powell Street. These ratings are under review and subject to approval by the Department of City Planning; they have not been officially adopted. The survey rated buildings from a high of "A" (highest Importance) to a low of "D" (Minor or No Importance). The criteria used in the evaluation were based on guidelines of the National Trust for Historic Preservation, the National Register of Historic Places, and the State Historic Resources Inventory.

About 21 buildings within two blocks of the site were rated by Heritage in its Preliminary 1985 Survey (see Figure 11, p. 30); all except one were rated "C" or "C**" (an asterisk or a double asterisk denotes a higher rating than the letter alone, but not high enough for the next category). The Vittorio Sattui building., at 1115-21 Stockton St., two blocks southeast of the site, was rated "B" in that survey.

The San Francisco Department of City Planning conducted a citywide inventory of architecturally significant buildings in 1976. In the 1976 Department of City Planning Architectural Inventory, approximately ten percent of the City's entire stock of buildings were awarded a rating for architectural merit ranging from a low of "0" to a high of "5". The total number of buildings which were rated from "3" to "5" represent less than two percent of the City's entire building stock.

About 90 buildings located within two blocks of the project site were included in the 1976 Department of City Planning Architectural Inventory (see Figure 11, p. 30). Our Lady of Guadalupe Church, directly across Broadway from the site, was rated "2." Four buildings on Russian Hill Place, two blocks northwest of the site, were rated "5" in that survey, as was 1115-19 Vallejo St., about one and one-half blocks northwest of the site. Buildings which were rated "4" in the survey include 1001 Vallejo St., 1034 Vallejo St., 1036 Vallejo St., and 1071 Vallejo St., all within one and one-half blocks northwest of the site; also rated "4" in that survey is the building at 735-43 Green St., about two blocks northeast of the site. For a description of the surveys, and the City Planning and Heritage rating systems, see Appendix B, pp. A-41 to A-42.

Buildings in the project area are primarily older development (constructed between 1906 and about 1920). Buildings east of the site, adjacent to Stockton St. tend to be built of



LEGEND

CITY LANDMARK BUILDINGS	LANDMARK NUMBER
① Atkinson House	97
② House of the Flag	46

KEY TO RATINGS

1 - 5	DCP Rating (1976, Citywide Architectural Inventory)
C - B	Heritage Rating (1985, Preliminary Survey, Chinatown)
▨	Blocks Included in Heritage Preliminary Chinatown Survey

● FIGURE 11
ARCHITECTURAL RESOURCES
IN THE PROJECT VICINITY
PINEVIEW

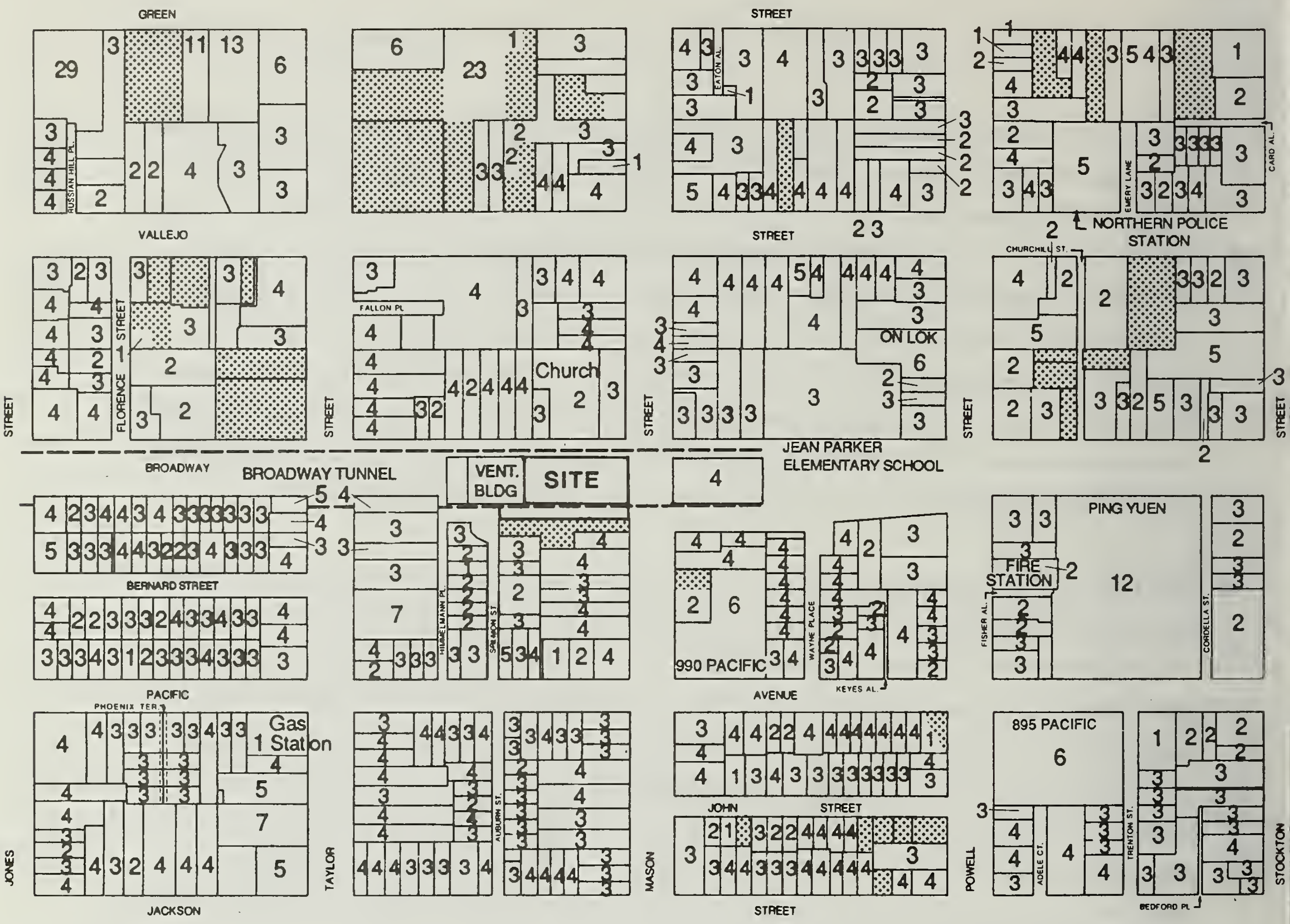
SOURCE: ESA, DCP AND HERITAGE

brick, with recessed windows, single cornices, and generally restrained facade detailing. Buildings on blocks west of Powell St. are primarily wood frame, and are of the San Francisco Bay style, including rounded bays and columned porches, and single or double cornice lines. The site vicinity is primarily characterized by three- to four-story buildings. There are several older (1920s) apartment buildings of six- to ten-stories located along Mason, Taylor, and Green Sts., north and west of the site. Two newer (1960s-70s) apartment buildings are located along Green St. between Mason and Jones Sts., at 857 Green St. (31 stories), and 999 Green St. (25 stories). There are three public housing complexes in the site vicinity: 895 Pacific Ave. and 990 Pacific Ave. are both six stories tall, and Ping Yuen, at 775 Broadway, is 11 stories tall (see Figure 11a).

- The Our Lady of Guadalupe Church, on the north side of Upper Broadway just west of Mason St. at Broadway, was constructed in 1912. The existing Church building replaced the original church structure, constructed in 1875, which was destroyed in the 1906 fire after the earthquake. Our Lady of Guadalupe Church is of the Mission Revival style, popular between 1890 and 1920. The Mission style is characterized by a simplicity of form, with round or basket arches as a prominent feature of the stucco or plaster facades. The Church has a recessed, rectangular main entry surrounded by a round arched secondary entry on the west, and a rectangular bay with basket arches openings on the east. At the second level, a circular niche with a painted plaster figure is surmounted on both sides by arched niches holding sculpted figures.

- Buildings north, south and east of the site generally are three- to four-stories tall and built to lot lines, forming continuous street frontages, which define the gridiron street pattern, laced with alleys, of Russian Hill and the Chinatown-North Beach transition area. Buildings within two blocks west of the site (along Green and Vallejo Sts. and Broadway), generally are one to two stories, with many buildings set back from lot lines on relatively large lots.

Short-range views south and east of the site are characterized by lowrise residential and retail buildings. The City District Health Center No. 4 blocks views (both short- and long-range) southeast and east from the site. The highrise towers of the Financial District are visible in mid- and long-range views to the southeast, over the tops of lowrise buildings. The higher ground of Russian Hill terminates the view west from the site. The view north from the site is dominated by the Our Lady of Guadalupe Church. The highrise



LEGEND

4	BUILDING HEIGHTS (IN STORIES)
▨	VACANT, OPEN SPACE OR SURFACE PARKING

● FIGURE 11a
EXISTING BUILDING HEIGHTS (IN STORIES)
IN THE PROJECT VICINITY
PINEVIEW

SOURCE: ESA

apartment buildings at 857 Green St. (30 stories) and at 999 Green St. (25 stories) are visible behind the Church. The San Francisco Bay is visible east, down Broadway, from the northern edge of the site. The project site is not visible from long-range view points (such as Twin Peaks and Potrero Hill) or from mid-range view points (such as Nob Hill and Telegraph Hill) because of intervening structures.

C. TRANSPORTATION, CIRCULATION AND PARKING

The site is located above the Broadway Tunnel at Mason St. At this location, Broadway extends both through the tunnel to Larkin St. and up the hill from just west of Powell St.

to Taylor St. (see Figure 1, p. 10). Upper Broadway splits off Broadway just east of the City's District Health Center No. 4 (across Mason St. from the site), and is one way westbound with one traffic and one parking lane on the north side of the City District Health Center No. 4 (and one way eastbound with one traffic and one parking lane on the south side of the City District Health Center).

Upper Broadway is two-way between Mason and Taylor Sts., it has two traffic lanes with one parking lane on the north side between Mason St. and Himmelman Pl. and two parking lanes between Himmelman Pl. and Taylor St. Mason St. is two-way with two traffic lanes and two parking lanes. The intersection of Upper Broadway and Mason St. is controlled by stop signs on the Upper Broadway approaches. The Broadway Tunnel carries four lanes of traffic and has a pedestrian walkway on each side of the Tunnel.

In the vicinity of the site, Mason St. and Broadway are designated as Transit Preferential Sts. in the San Francisco Master Plan, on which priority is given to transit vehicles over autos during commute and business hours on weekdays./1/ Broadway is also designated as a Primary Vehicular St., which the Master Plan defines as "major routes for automobile and truck movements into and out of the Downtown area."

● The site is served by San Francisco Municipal Railway electric trolley, motor coach and cable car lines. The Powell and Mason Cable Car lines operate on Mason St. in front of the site. There are three other Muni routes within two blocks of the site, the 83-Pacific, the 30-Stockton and the Powell/Hyde Cable Car line (see Figure 12, p. 33).

Pedestrian activity on sidewalks near the site is light. The Mason St. sidewalk in front of the site is ten feet wide. There is no sidewalk on the south side of Upper Broadway adjacent to the site.

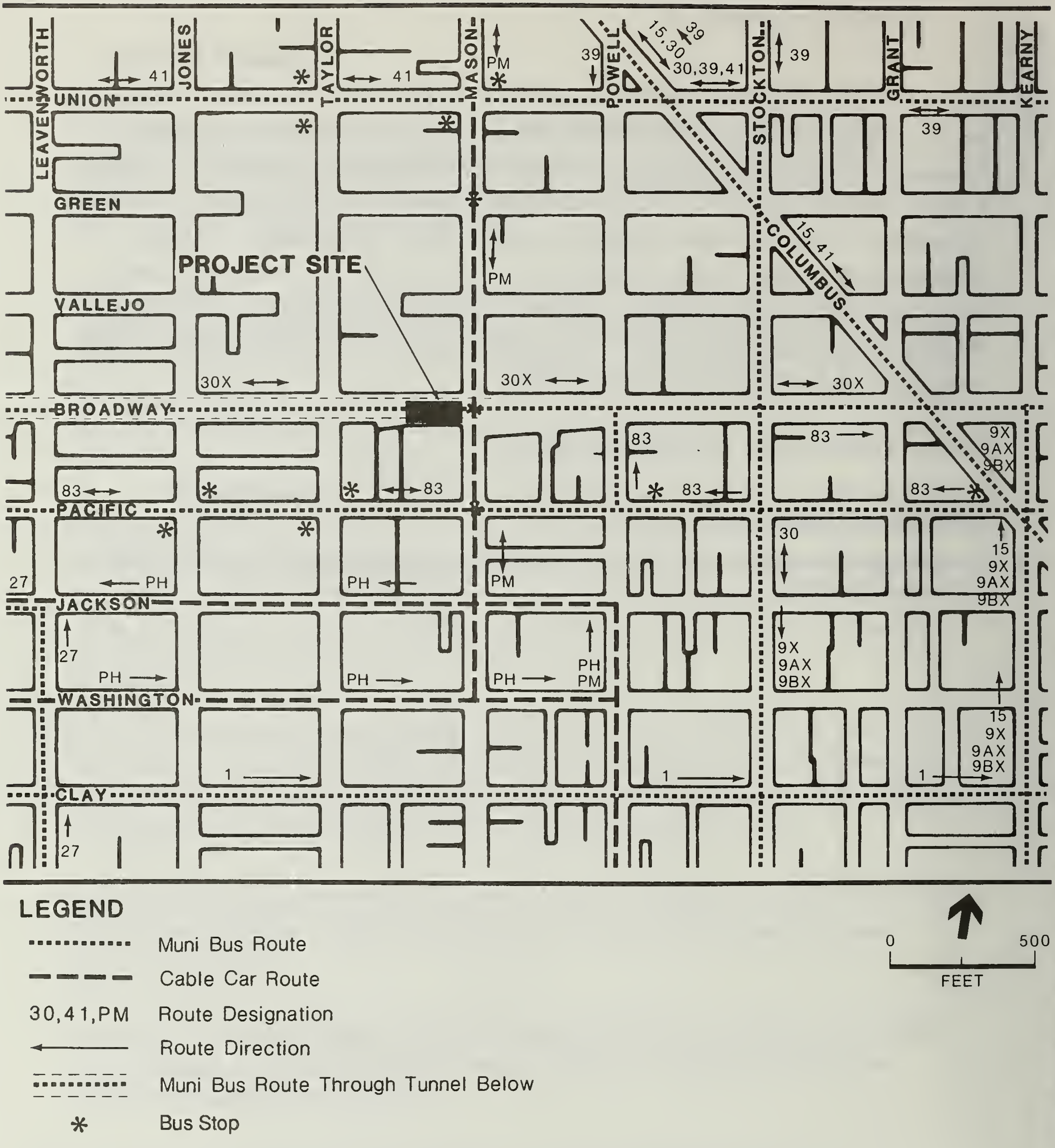
Parking on streets in the area is limited to 2 hours between 8 a.m. and 9 p.m. on Monday through Saturday. Parking permits that except vehicles from these restrictions are available for neighborhood residents.

● The Chinatown neighborhood was included in a parking study conducted by the Department of City Planning as part of a Neighborhood Parking Plan for several neighborhoods in the City and is identified as the second worst neighborhood in the City in terms of parking conditions./2/ The area surveyed was roughly bounded by Broadway, Columbus, Montgomery, Sacramento, Grant, Washington and Powell. This area is within one block of the site to the east, but parking conditions would be similar to those surrounding the site. The report describes parking in Chinatown as follows, "Parking conditions in Chinatown were found to be extremely poor, with the predominant problem being a pervasive shortage of spaces. Legal on-street supply was occupied at barely under 100 percent. Parking in white and red zones, double-parking and parking across driveways accounts for 18 percent of all on-street parking."

NOTES - Transportation, Circulation and Parking

/1/ San Francisco Department of City Planning, January 1983, Transportation, An Element of the Master Plan.

● /2/ San Francisco Department of City Planning, Neighborhood Parking Plan 1986 - 1990, published April 1986.



SOURCE: MUNI, SAN FRANCISCO STREET & TRANSIT MAP, MARCH 1986 AND ESA

FIGURE 12
TRANSIT ROUTES
IN PROJECT AREA
PINEVIEW

D. AIR QUALITY

The Bay Area Air Quality Management District (BAAQMD) operates a regional monitoring network which measures the ambient concentrations of six air pollutants: ozone (O_3), carbon monoxide (CO), total suspended particulates (TSP), lead (Pb), nitrogen dioxide (NO_2), and sulfur dioxide (SO_2). On the basis of the monitoring data, the Bay Area, including San Francisco, currently is designated a non-attainment area with respect to the federal ozone and CO standards. A four-year summary of the data collected at the BAAQMD monitoring station nearest the project site (about three miles southeast at 900 23rd St.) is shown in Appendix E, p. A-46, together with the corresponding federal and/or state ambient air quality standards. In 1985, there were five violations of the previous state 24-hour average TSP standard. In 1984, there was one violation of the state ozone standard, and five violations of the previous state 24-hour average TSP standard; in 1983, there was one violation of the federal and state one-hour average ozone standards and four violations of the previous state 24-hour average TSP standard; and in 1982 there was one violation of the federal and state eight-hour CO standard and three violations of the state 24-hour average TSP standard./1/

BAAQMD has conducted several CO "hotspot" monitoring programs in the Bay Area, including two in San Francisco. One CO monitoring program was conducted during the winter of 1979-80 at the intersection of Washington and Battery Sts. about 0.6 miles east of the site./2/ The high eight-hour average concentration was 10.1 ppm, which violates the 9-ppm state and federal standards by 1.1 ppm. The high one-hour average concentration of 15 ppm does not violate the 20-ppm state standard or the 35-ppm federal standard. Another CO monitoring program was conducted during the winter of 1980-81 at the intersection of Geary and Taylor Sts., about 0.7 miles south of the site, and 100 Harrison St. at Spear, about 1.3 miles southeast of the site./3/ At Geary and Taylor the observed high eight-hour average concentration was 11.5 ppm, which violates the standards by 2.5 ppm, and the high one-hour concentration was 15 ppm, which does not violate standards. At Harrison St. the observed high eight-hour and one-hour average concentrations were 7.8 ppm and 13 ppm, respectively, which do not violate the standards. These data indicate that locations in San Francisco near streets with high traffic volumes and congested flows may experience violations of the eight-hour CO standard under adverse meteorological conditions. In December 1985, the City monitored CO and counted traffic at the Sixth and Brannan intersection. These data are still being analyzed.

Comparison of these data with those from other BAAQMD monitoring stations indicates that San Francisco's air quality is among the least degraded of all the developed portions of the Bay Area. Three of the four prevailing winds, west, northwest, and west-northwest, blowing off the Pacific Ocean, reduce the potential for San Francisco to receive pollutants from elsewhere in the region.

San Francisco's air quality problems, primarily CO and TSP, are due largely to pollutant emissions from within the City. CO is a non-reactive pollutant and its major source is motor vehicles. CO concentrations are generally highest during periods of peak traffic congestion or adverse meteorology. TSP levels are relatively low near the coast, increase with distance inland, and peak in dry, sheltered valleys. The primary sources of TSP in San Francisco are demolition and construction activities, and motor vehicle travel over paved roads.

San Francisco contributes to regional air quality problems, primarily ozone, a regional problem, in other parts of the Bay Area. Ozone is not emitted directly from sources, but is produced in the atmosphere over time and distance through a complex series of photochemical reactions involving hydrocarbon (HC) and nitrogen oxide (NOx) emissions, which are carried downwind as the photochemical reaction occurs. Ozone standards are exceeded most often in the Santa Clara, Livermore, and Diablo Valleys, because local topography and meteorological conditions favor the buildup of ozone and its precursors in those locations.

In 1982, emissions from motor vehicles were the source of 86% of the CO, 46% of the HC, 44% of the TSP, and 56% of the NOx emitted in San Francisco, while power plant fuel combustion was the largest single source of sulfur oxides (SOx), about 33% of the total./4/ These percentages are expected to apply reasonably well to current conditions.

In response to the Bay Area's ozone and CO non-attainment designations, the Association of Bay Area Governments (ABAG), BAAQMD, and the Metropolitan Transportation Commission (MTC) prepared and adopted the 1982 Bay Area Air Quality Plan, which establishes pollution control strategies to attain the federal ozone and CO standards by 1987 as required by federal law./5/ These strategies were developed on the basis of detailed subregional emission inventories and projections, and mathematical models of pollutant behavior, and consist of stationary and mobile source emission controls and transportation improvements. The BAAQMD, MTC, and California Bureau of Automotive Repair (a state agency) have primary responsibility for implementation of these strategies.

NOTES - Air Quality

/1/ State standards for particulate matter changed in 1983 to concentrate on fine particulate matter, which has been demonstrated to have health implications when inhaled. Concentration standards also changed. There is not yet an adopted method for monitoring fine particulate matter. Until the State adopts a method, it is not possible to determine what proportion of TSP in San Francisco would be subject to review against the new standards.

/2/ Association of Bay Area Governments, AQMP Tech Memo 33, "Summary of 1979/80 Hotspot Monitoring Program," Berkeley, California, June 1980.

/3/ Association of Bay Area Governments, AQMP Tech Memo 40, "Results of the 1980/81 Hotspot Monitoring Program for Carbon Monoxide," Berkeley, California, January 1982.

/4/ Bay Area Air Quality Management District (BAAQMD), "Base Year 1982 Emissions Inventory, Summary Report," San Francisco, California, November 1, 1983.

/5/ Association of Bay Area Governments (ABAG), BAAQMD, and MTC, 1982 Bay Area Air Quality Plan, Berkeley, California, December 1982.

IV. ENVIRONMENTAL IMPACTS

An application for environmental evaluation for the project was filed on December 26, 1985; a revised application was filed on April 15, 1986. On August 15, 1986 based on an Initial Study, the Department of City Planning, Office of Environmental Review determined that an Environmental Impact Report was required. Issues determined as a result of the Initial Study to require no further environmental analysis include: Visual Quality, Population, Operational Noise, Air Quality during Construction, Operational Air Quality, Shadows and Wind, Utilities/Public Services, Biology, Geology/Topography, Water, Hazards, Energy/Natural Resources, and Cultural Resources. Therefore, this document does not discuss these issues (see Appendix A, pp. A-2 to A-40, for the Initial Study). Some of the impacts presented in this section are not physical environmental effects as defined by the California Environmental Quality Act. They are included in the EIR for informational purposes only.

A. LAND USE AND ZONING

LAND USE

The project would be a residential project located in a predominantly residential neighborhood. The project would be compatible in use with other development in the area. The project would be new construction of a six-story residential apartment building with a community center for senior citizens. It would contain 69 units of housing for senior citizens and physically handicapped persons, and one apartment for a resident manager adding a permanent residential population of about 77 persons. The project would add to the supply of housing in the immediate area reserved for low-income senior citizens; it would result in an intensification of residential uses and of facilities serving senior citizens. The senior center would be for use by project residents and other senior citizens in the community. It would serve lunch for up to 150 people. The senior center would replace an existing senior center currently located at 640 Pine St. The project would be of intermediate scale compared with surrounding development.

The Master Plan

The project would respond to Objectives and Policies of the Residence Element of the Master Plan./1/ It would respond to Objective 1, "to provide new housing for all income groups in appropriate locations." Development and operation of the project would be conducted by the Pineview Housing Corporation, with rents for the housing units subsidized by the Federal Housing and Urban Development (HUD) Section 8/202 Program. The project would provide rental housing for low-income seniors and physically handicapped persons. Objective 1, Policy 1 encourages "development of housing on surplus, underused and vacant public lands." The project would develop housing on a site which is air-rights over public property (The Broadway Tunnel and a City-owned lot); thus, the project would address this policy. The project would also address Objective 1, Policy 4 to "encourage infill housing on appropriate sites in established neighborhoods," as it would be located on a vacant site in a residential area.

The project would address Objective 2, "to increase substantially the supply of housing without overcrowding or adversely affecting the prevailing character of existing neighborhoods". The project would address Objective 2, Policy 1 which states "set allowable densities in established residential areas at levels which will maintain neighborhood scale and character"; and Objective 2, Policy 2 which encourages "higher residential density in areas adjacent to downtown and in neighborhood commercial districts where higher density will not have harmful effects." The project would be residential development at a higher density than most of the residential parcels in the immediate area. The proximity of the site to the commercial and social services of Chinatown and to Muni lines with connections to city-wide and regional transit lines, combined with occupancy by low-income senior citizens and handicapped persons, makes it unlikely that the project would generate automobile use similar to, and other impacts associated with, higher density residential development. Objective 2 , Policy 3 states "in appropriate cases, consider the size of the unit in establishing allowable densities." The project would address this policy; it would provide 70 units of housing at between 300 gsf and 480 gsf per unit.

The project would address Objective 3, "to retain the existing supply of housing," in that it would not displace any existing housing units and would add to the City's housing supply.

By providing Federally subsidized rental housing on a publicly owned site, the project would respond to Objective 5 of the Residence Element, "to provide housing affordable by all income groups, particularly low and moderate income households." The project would address Objective 5, Policy 1 to "use the City's financial powers and resources to reduce the cost and increase the supply of low and moderate income housing." The project would address Objective 7, "to provide maximum housing choice," and specifically Objective 7, Policy 2 "promote adaptability and maximum accessibility of residential dwellings for disabled occupants;" the project would provide housing specifically designed for occupancy by senior and physically handicapped persons. The project would also address Objective 7, Policy 3 to promote the availability of units suitable for groups with special housing needs . . . including the elderly," by providing 69 housing units for senior citizens and physically handicapped persons.

ZONING

The Pineview Senior Housing project, located within an RM-2 use district, would be consistent with the permitted principal and conditional uses designated for this district, though at a higher density than that allowed for this zoning designation, under the City Planning Code. A redesignation of the site from RM-2 (Residential Mixed, Moderate Density) to RM-4 (Residential Mixed, High Density) is proposed as part of the project.

Under Section 209.1 of the City Planning Code, basic maximum permitted densities are: one residential unit for each 600 gsf of lot area under RM-2 zoning, one residential unit for each 400 gsf of lot area under RM-3 zoning, and one residential unit for each 200 gsf of lot area under RM-4 zoning. Section 209.1(m) of the City Planning Code allows a doubling of these densities for housing designed for and occupied by senior citizens and physically handicapped persons. The proposed project's 70 units of housing would exceed the maximum of 42 units and 63 units which could be constructed on the 12,615-gsf site under RM-2 and RM-3 zoning respectively including the density bonus. Under RM-4 zoning, development of up to 40 residential (450 sq. ft. studios) units with 40 parking spaces (one for each dwelling unit) on two levels, not specifically designed for seniors and the physically handicapped, with no variances to Code requirements, could be constructed on the site. This assumes that all units would face a rear-yard, public street or alley, or other open area as required by City Planning Code Section 140, unlike the proposed project and alternatives in this EIR. This also assumes the rear-yard open space would be provided, bulk limits would be met, and the structure would be a total of six stories tall as with the proposed project. A maximum of 60 residential units specifically designed for seniors and the physically handicapped, with 12 parking spaces, with no Code variances required, could be constructed on the site under RM-4 zoning using the same method of analysis. The 70 units of housing for seniors and physically handicapped occupants and the senior community center proposed as the Pineview project would therefore represent the maximum development project for the site under RM-4 zoning.

The project would require Conditional Use authorization under Section 303 of the City Planning Code for exceeding 40 ft. in height in an R-District (Section 253), and for a community facility (senior community center) in an R-District (Section 209.4(a)).

● At a maximum height of about 58 ft., the project would be within the maximum height limit of 65 ft. established under the 65-A Height and Bulk District. The project would have a maximum length of 85 ft. and a maximum diagonal dimension of 109 ft. above a height of 40 ft. (maximum allowable length is 110 ft. and maximum allowable diagonal dimension is 125 ft.). The project would require a variance for not providing a rear-yard setback (as required under Section 134a); a setback of at least 45% of the lot depth (72 ft. for the project site) is required under RM-2 zoning, and a setback of at least 25% of the lot depth (40 ft. for the project site) is required under RM-4 zoning. The project would also require a variance from the requirement that apartment windows face a public right-of-way or rear yard of at least 25 ft. in width (Section 140.1); 32 of the project's residential units facing south would face the 10 ft. wide easement which would remain open for access to the sewer line. The project would also require a variance for not providing the required number of off-street parking spaces; under Section 151 of the Code, one space is required for each dwelling unit, except where the housing units are specifically designed for and occupied by senior citizens and the physically handicapped, where one-fifth the required number of spaces is required. No off-street parking would be required for the community center; thus, 14 spaces would be required for the project, while 12 would be provided.

Section 135(d) of the City Planning Code, Table 3, specifies that 36 gsf of private usable open space are required for each dwelling unit under RM-4 zoning, and 80 gsf for each dwelling unit under RM-2 zoning. Common usable open space may be substituted for private open space in the ratio of 1.33 times the required amount of private open space. The project would contain 70 dwelling units; 2,520 gsf of private open space or 3,352 gsf of common open space would be required for the project under RM-4 zoning. For dwellings specifically designed for and occupied by senior citizens or physically handicapped persons the minimum amount of open space to be provided is one-half the amount otherwise required (Section 135(d)(3)). The project would include a ground-floor plaza of 2,685 gsf facing Mason St., and private outdoor terraces on the third, fifth and sixth floors containing a total of about 800 gsf. The project would thus provide more than the required open space for senior citizens under RM-4 zoning.

The project would have an average front setback of about 37 ft. from the Mason St. lot line. The required front setback for a corner lot is based on that of the nearest adjacent building (Section 132(a-d)). The nearest building on Mason St. is built to the front lot line; therefore no front setback would be required for the project.

The project would not conflict with any amendments to the City Planning Code proposed under Interim Controls for Chinatown, the western boundary of which would be one-half block east of the project site./2/

NOTES - Land Use and Zoning

/1/ The Residence Element of the Master Plan, as amended by the San Francisco City Planning Commission on June 28, 1984 (resolution 10045).

/2/ Interim Controls in Chinatown Districts, adopted July, 1986.

B. URBAN DESIGN

URBAN DESIGN

The project would replace airspace open to the Broadway Tunnel below with a six-story residential structure (see Figures 13 to 15, pp. 42 to 44). The City-owned lot would remain open as a light and air easement for the project.

The Urban Design Element of the San Francisco Master Plan contains policies and principles which may be used to evaluate the proposed project. Table 2, pp. 44 to 46, Relationship Between Applicable Urban Design Policies of the Master Plan and the Proposed Project, compares the project to these policies.

The project would be set back in steps by between about 25 ft. and 65 ft. from the Mason St. property line, and between about 16 ft. and about 28 ft. from the eastern portion of the Upper Broadway property line. The upper floors of the project would set back on Mason St. by about 12 ft. each at the third, fifth, and sixth floors. There would also be partial four-ft. setbacks from the southern property line, at the third, fourth, fifth, and sixth floors.

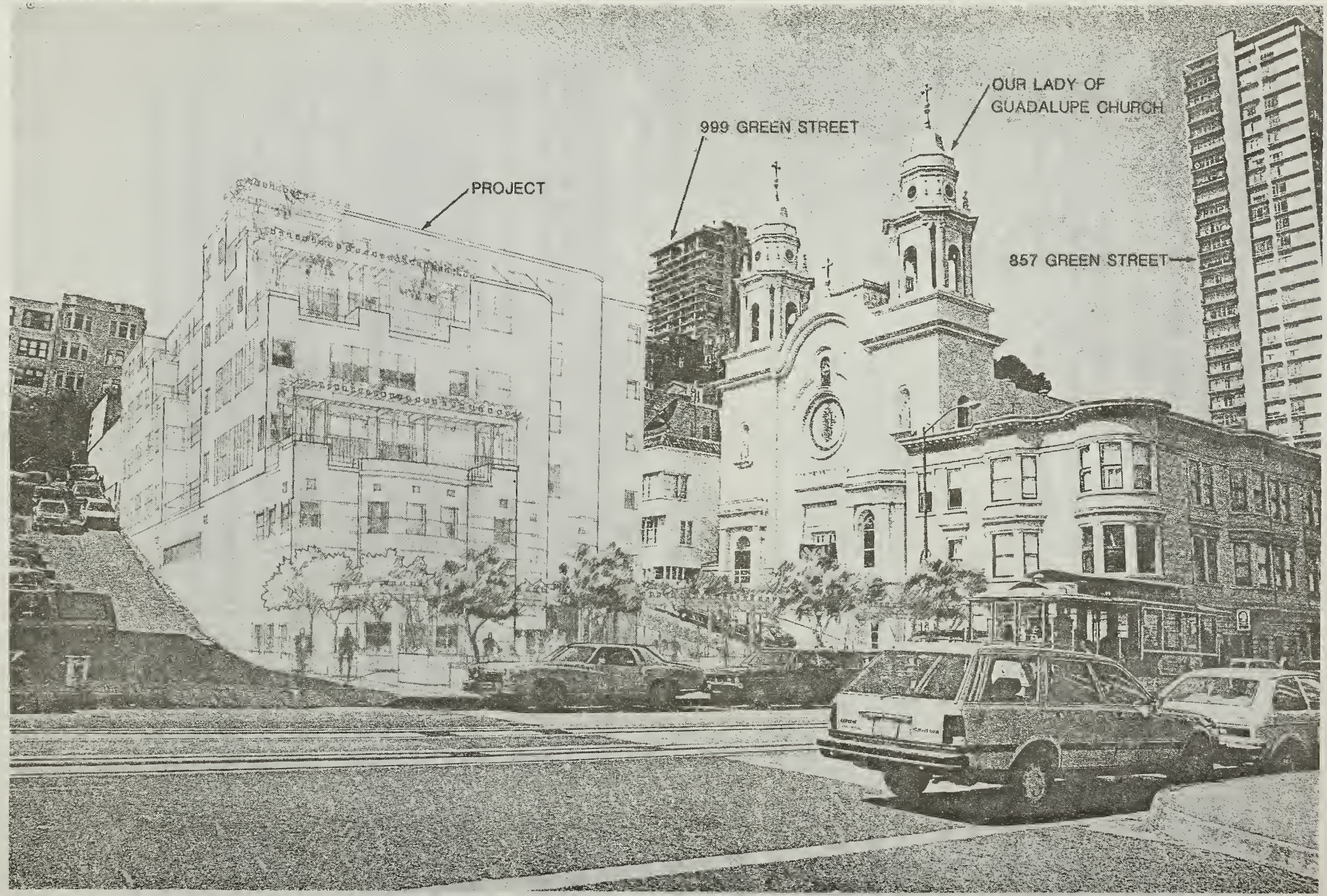


FIGURE 13
PHOTOMONTAGE FROM MASON STREET
PINEVIEW

SOURCE: GORDON CHONG AND ASSOCIATES

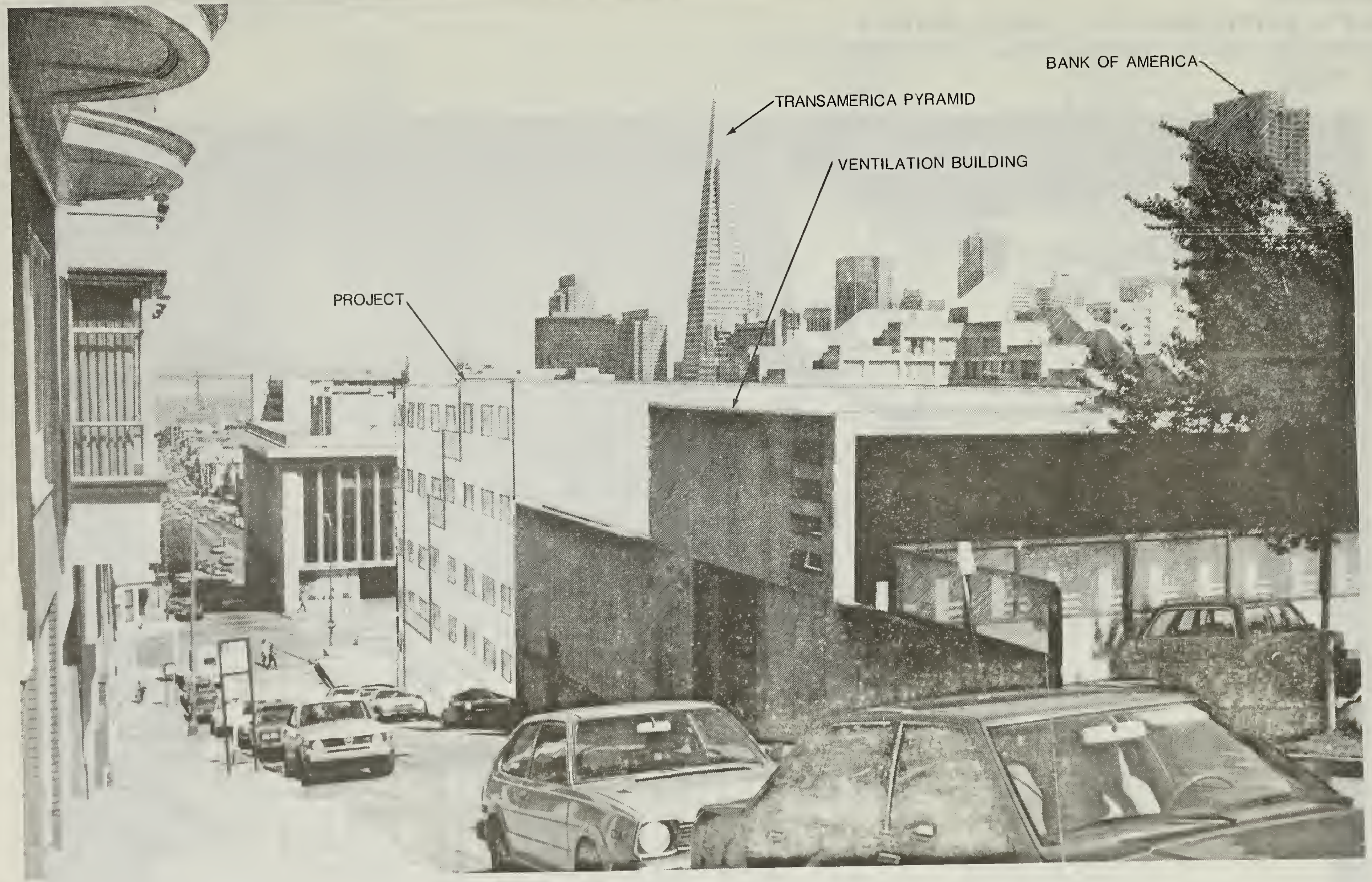


FIGURE 14

PHOTOMONTAGE FROM BROADWAY (ABOVE BROADWAY TUNNEL)

PINEVIEW

SOURCE: GORDON CHONG AND ASSOCIATES

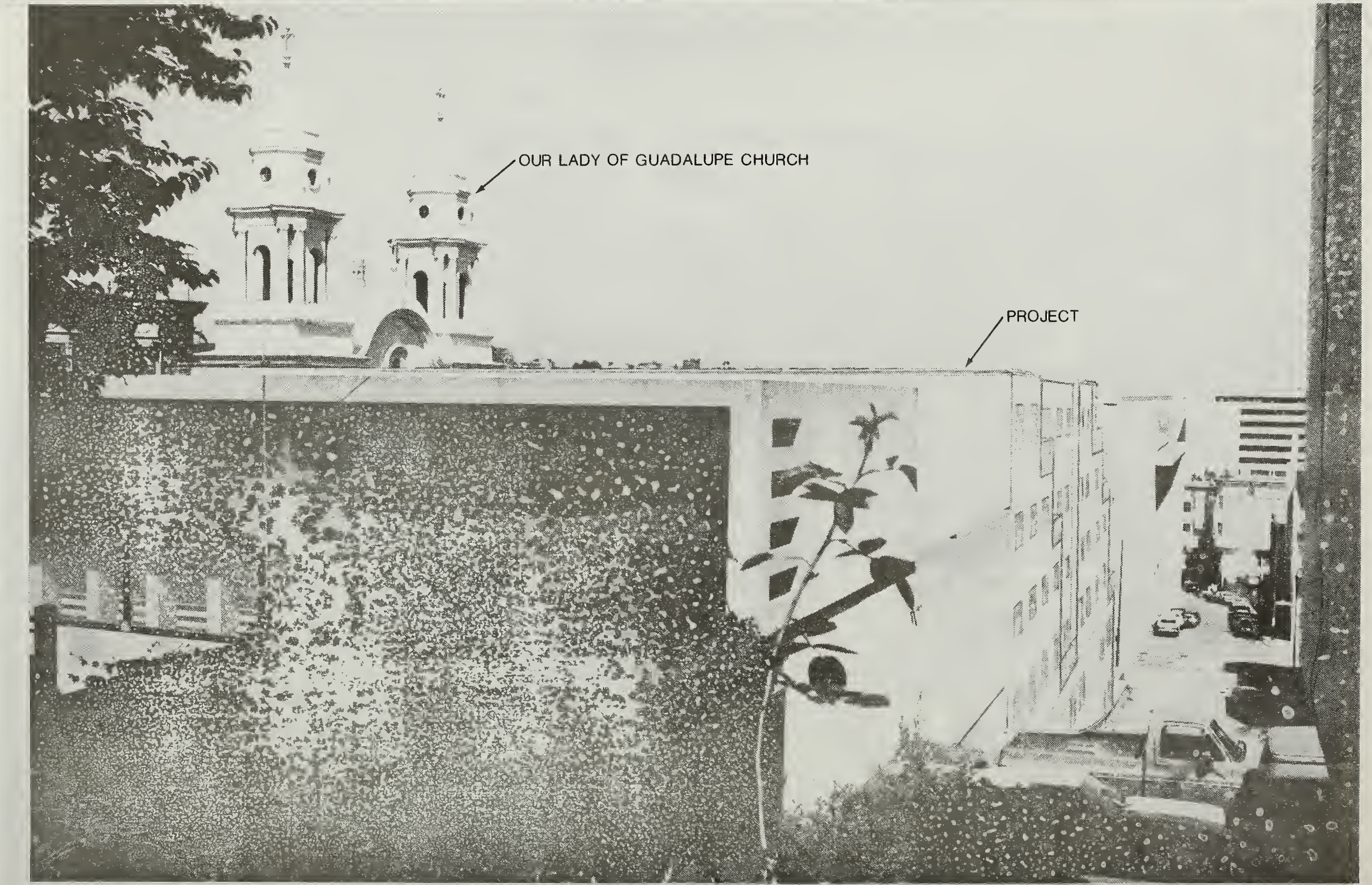


FIGURE 15
PHOTOMONTAGE FROM TOP OF STEPS BETWEEN
SALMON STREET AND HIMMELMAN PLACE
PINEVIEW

SOURCE: GORDON CHONG AND ASSOCIATES

TABLE 2: RELATIONSHIP BETWEEN APPLICABLE URBAN DESIGN POLICIES OF THE MASTER PLAN AND THE PROPOSED PROJECT

URBAN DESIGN PLAN POLICIES	RELATIONSHIP OF PROJECT TO POLICIES
Objective 1, Policy 1 - "Recognize and project major views in the City, with particular attention to those of open space and water." (p. 10)	The project site is located atop the Broadway Tunnel, and would impede views to the east of some downtown high-rises from vantage points and residences along upper Broadway between the site and the intersection of upper Broadway and Florence St., about one block west of the site. The project would not block any public or private views of the Bay or any open space.
Objective 1, Policy 3 - "Recognize that buildings, when seen together, produce a total effect that characterizes the City and its districts." (p. 10)	● The 58-ft.-tall, six-story building would be taller than most adjacent three- to four-story residential buildings, but would be lower in height than larger residential buildings in the vicinity, such as the 11-story Ping Yuen, two blocks east of the site. It would be comparable in height to the six-story On-Lok House building about one block east of the site, and the six-story public housing building at 895 Pacific Ave., about one and one-half blocks southeast of the site, and the six-story public housing building at 990 Pacific Ave., one block south of the site. It would be lower than the private apartment buildings at 875 Green St. (31 stories) and 999 Green St. (25 stories) one to two blocks northwest of the site. The project would be comparable in scale to the City District Health Center No. 4. The project would be shorter than the Our Lady of Guadalupe Church. It would be about the same height as the ventilation building.
Objective 1, Policy 6 - "Make centers of activity more prominent through design of street features and by other means." (p. 12)	The project would increase the visual prominence of the site compared to the existing air-space over the Broadway Tunnel and the vacant lot. The project would include trees and other landscaping in front of the pedestrian entrance on Mason St., giving pedestrian scale and interest to the site. The proposed plaza could serve as a gathering place for the public. On Sundays, churchgoers could congregate in this area instead of or as well as on the Church steps.

(Cont.)

TABLE 2: RELATIONSHIP BETWEEN APPLICABLE URBAN DESIGN POLICIES OF THE MASTER PLAN AND THE PROPOSED PROJECT (Continued)

URBAN DESIGN PLAN POLICIES	RELATIONSHIP OF PROJECT TO POLICIES
Objective 2, Policy 4 - "Preserve notable landmarks and areas of historic, architectural or aesthetic value, and promote the preservation of other buildings and features that provide continuity with past development." (p. 25)	The project site is not occupied by any buildings; the project would not involve the demolition or alteration of any structure which is a landmark or is rated by Heritage or included in the City Planning Architectural Inventory. The project would be set back from the corner of Mason St. and Upper Broadway to minimize view blockage of the rated Our Lady of Guadalupe Church.
Objective 2, Policy 6 - "Respect the character of older development nearby in the design of new buildings." (p. 25) Objective 3, Policy 1 - "Promote harmony in the visual relationships and transitions between new and older buildings." (p. 36) Objective 3, Policy 2 - "Avoid extreme contrasts in color, shape and other characteristics which will cause new buildings to stand out in excess of their public importance." (p. 36)	The exterior design of the project would feature rounded-corners and set backs on Mason St. and upper Broadway. The design is intended to relate to the rounded bays in older adjacent development. Building materials would be similar to those used in existing newer development. See also discussion of Objective 1, Policy 3 above. Project building materials would be light in color to blend with building materials of surrounding development (both new and old). The project would be set back from the corner of Mason St. and Upper Broadway to minimize view blockage of the Our Lady of Guadalupe Church. Upper level setbacks from Mason St. would reflect the topography of the hill. Upper level terraces and setbacks would also reduce the apparent bulk of the building.
Objective 3, Policy 4 - "Promote building forms that will respect and improve the integrity of open spaces and other public areas." (p. 36)	Upper Broadway rises steeply toward the west; thus, the roof of the project would be at approximately the same height above street level as the public mini-park, which is west of the site on the project block. Therefore, the project would not block views from the mini-park. The project would include trees and other landscaping at the ground-floor open space plaza facing Mason Street and Broadway.

(Cont.)

TABLE 2: RELATIONSHIP BETWEEN APPLICABLE URBAN DESIGN POLICIES OF THE MASTER PLAN AND THE PROPOSED PROJECT (Continued)

URBAN DESIGN PLAN POLICIES		RELATIONSHIP OF PROJECT TO POLICIES
Objective 3, Policy 5 - "Relate the height of buildings to important attributes of the city pattern and to the height and character of existing development." (p. 36)	●	The 58-ft.-tall project would be shorter than the maximum allowable height (65 ft.) for the site. The six-story project would be taller than most older residential development in the vicinity (three- to four-stories), but would be comparable in height to newer residential development in the area. See Objective 1 Policy 3 and Objective 3 Policy 1 above. The project would be on the eastern slope of Russian Hill and because of the slope of the hill, the roof level of the project would be below that of two- and three-story residential structures across Upper Broadway at the western end of the site. The project would not be visible from the other side of the hill.
Objective 3, Policy 6 - "Relate the bulk of buildings to the prevailing scale of development to avoid an overwhelming or dominating appearance in new construction." (p. 37)	●	In order to reduce apparent bulk, the project's design would incorporate a series of setbacks of between 16 ft. and 28 ft. from lot lines at Mason St. and Broadway. The project would also have 12-ft. setbacks on the Mason St. facade at the third, fifth and sixth floors, and four-foot setbacks from the southern property line at the third, fifth and sixth floors. The upper level landscaped terraces would also reduce the apparent bulk of the building. Building materials would be light in color, similar to those used in existing newer developmet which could also serve to lessen the apparent bulk of the building.

SOURCE: Urban Design Element, San Francisco Master Plan, 1971; and Environmental Science Associates

The project would include rounded-bay windows at the ground and second floors on Mason St. These bays are intended to relate to the rounded bay windows of adjacent older buildings. Setbacks at the third, fifth, and sixth floors on the Mason St. facade would result in a stepped-back facade appearance with each setback incorporating an outdoor landscaped terrace. These setbacks and terraces would help reduce the building's apparent height and bulk. The upper level setbacks from Mason St. would reflect the topography of the hill.

The ground-floor plaza would be landscaped and would include benches and other pedestrian amenities. The plaza would give the building a sense of pedestrian scale. The building facade at the ground and second floors would have a textured surface, with horizontal indented bands at regular intervals. The facades on the ground and second floors would be faced in light gray cement plaster. Facades on the third through sixth floors would be faced in white plaster. All windows would be clear glass, set in dark gray aluminum frames flush with the facade.

The six-story building would be taller and more visible than most existing residential structures in the immediate vicinity which are mainly three and four stories tall. Because of the slope of Russian Hill, the roof of the project would be at about the same level as the ventilation building, adjacent to the site on the west. It would be shorter than the Our Lady of Guadalupe Church, across Upper Broadway from the site. It would be of comparable scale to newer housing structures for low-income persons in the vicinity, such as the five-story On-Lok House building (1441 Powell St.), the six-story 895 Pacific Ave. building, and the six-story 990 Pacific Ave. building. The project would be shorter than some newer residential development on Russian Hill, one to two blocks northwest of the site, such as the 25-story, 999 Green St. building and the 30-story, 857 Green St. building.

The project would not block views east along Upper Broadway of San Francisco Bay and the Bay Bridge. The project would block views of lower stories of downtown office buildings from points along Upper Broadway and from residences on the north side of Upper Broadway between Mason and Taylor Sts. The project would not be visible from points beyond about one-half block in any direction from the site. The project would block views of the architecturally rated Our Lady of Guadalupe Church and views of buildings west of the Church along Upper Broadway from points along a 10 ft. to 20 ft. portion of Mason St. south of the project site, including views from cable cars traveling

● along that portion of Mason St. The roof of the project would be visible in views north from the intersection of Mason and Sacramento Sts. on Nob Hill, and would partially block views of Our Lady of Guadalupe Church from that location. The project would block views of the

Church and of Telegraph Hill from residences and streets and sidewalks located at the northern end of Salmon St. and Himmelmann Place, immediately southwest of the site.

The project would block some public views of the architecturally rated Our Lady of Guadalupe Church (as described above). Project construction could disturb frescoes on the church walls (see discussion under Noise Impacts, p. 55).

C. TRANSPORTATION

CONSTRUCTION/1/

During the initial phases of construction (mobilization, site preparation and foundation and building platform preparation), the Broadway Tunnel would be partially obstructed by equipment. One traffic lane in each direction and one pedestrian walkway would be closed for approximately 24 weekdays most likely during the hours of 9 a.m. to 3 p.m. The construction equipment would be removed and all lanes would be open during the remaining hours of those days.

The Broadway Tunnel carries an average of 35,940 vehicles daily, of which about 10,900 travel through the tunnel during the hours of 9 a.m. to 3 p.m./2/ Traffic volumes through the tunnel between the period 9 a.m. to 10 a.m. (the hour with the most traffic outside of the peak hours) average 2,080 vehicles; the peak direction during this period is eastbound with an average of 1,325 vehicles and with a maximum of 1,540 vehicles. The capacity of a lane in the Broadway Tunnel has been estimated to be about 1,500 vehicles per hour./2/

Project construction would reduce the capacity of the tunnel by approximately half as one lane of the two lanes in either direction would be in operation. The effective capacity of each lane is likely to be less than the existing 1,500 vehicles per hour per lane capacity due to impedance factors associated with construction activities (e.g., "rubbernecking"). Traffic volumes in excess of the tunnel's effective capacity could therefore occur during the estimated 20-day construction period that the tunnel would be obstructed. If the observed maximum of 1,540 vehicles per hour between 9 a.m. and 10 a.m. were present, substantial congestion could persist well beyond 10 a.m./2/ In order to divert traffic away from the Broadway tunnel during this temporary construction period, a mitigation measure (see p. 69) has been included to warn motorists concerning construction activities at key routing decision points so that alternative routes can be chosen. This mitigation measure would be expected to reduce the severity of construction period impacts, but some congestion and slow movement through the tunnel as well as queues at entrances to the tunnel may be experienced. Construction activities may also result in temporary schedule adherence problems for Muni line 30X.

Closure of one pedestrian walkway could result in safety hazards to pedestrians. As pedestrians approach the tunnel and find that the walkway is closed, they may attempt to cross Broadway to get to the opposite walkway (see mitigation measure on p. 69).

- During subsequent phases of construction (metal decking, steel erection and finishing) truck trips would result from material deliveries; there would be an average of two truck trips per day and a maximum of six truck trips per day. Trucks would use Upper Broadway to get to the site. The impact of construction truck traffic would be a lessening of the capacities of access streets and haul routes because of slower movements and larger turning radii of trucks. Any truck traffic from 7 a.m. to 9 a.m. or from 4 p.m. to 6 p.m. would coincide with peak-hour traffic, particularly at freeway access points, and would serve to worsen service levels at freeway ramps.

There would be a temporary increase in traffic and parking demand from construction workers at the site. The maximum number of construction workers on site at any one time would be about 30. Traffic and parking impacts would occur in proportion to the number of construction workers who would drive to the site (see mitigation measure, "Under Consideration by the Project Sponsor," on p. 69).

The intersection of Mason St. and Upper Broadway was counted and analyzed during the p.m. peak hour./3/ It operates at a volume-to-capacity (V/C) ratio of 0.36 and Level of Service A. Level of Service A represents excellent conditions; descriptions of levels of service are shown in Table C-1, Appendix C, p. A-43 and the methodology used is described in Appendix C on p. A-44. Truck trips and construction worker traffic would not be expected to effect this intersection enough to result in a change in the LOS.

The west sidewalk and adjacent parking lane on Mason St., in front of the site, would be closed for construction activities for approximately one year. This would temporarily remove three on-street parking spaces. If double-parking of trucks and other construction vehicles were to occur, the adjacent cable car tracks and southbound traffic lane could be blocked. It would be the project sponsor's responsibility to see that this would not occur, and a mitigation measure has been included to ensure that the cable cars and vehicular traffic would not be impeded (see mitigation measure on p. 69). Closure of the sidewalk would result in safety hazards from pedestrians walking in the street (see mitigation measure, p. 69). Also Lot 42 would be closed for three months, which would make access difficult to the 18 off-street parking spaces, presently used by Alfred's Restaurant; the number of parking spaces available to Alfred's would be reduced (see mitigation measure, p. 69).

PROJECT IMPACTS

Travel Demand

Trip generation for the two aspects of the project (residential and senior center) have been calculated separately; thus, total trips are overstated, as many of the project residents would be expected to use the senior center. Trip generation for the residential portion of the project is based on standard published trip-generation factors, while trip generation for the senior center is based on a survey of a similar center located at 640 Pine St. in San Francisco, conducted on April 30, 1986.

The residential portion of the project would generate 280 person trips per day (including staff, visitors and residents) and the senior center would generate up to about 330 person trips per day (including employees, visitors and volunteers), for a total of up to 610 person trips per day from the project./4,5/ Of the total daily trips, about 35 would occur during the p.m. peak hour./4/ All of these would be from the residential portion of the project as almost all of the trips to the senior center would occur around the lunch hour./5/ P.m. peak-hour trips from the project are expected to be for shopping and personal business; these are estimated to be primarily walking trips (about 75% of the total p.m. peak hour trips). Therefore, the project would result in minimal increases in traffic (about three vehicles) and transit ridership (about four Muni trips and two BART trips) including the Mason/Powell cable car line in front of the site and the 83 Pacific Muni line.

Meals would be delivered to the senior center by van Monday through Friday. There would be two deliveries in the morning (at 10:40 a.m. and 11:30 a.m.) and one delivery in the afternoon at 3:30 p.m. The 10:40 a.m. delivery is for the Home Delivery program; in which prepared meals are brought to the senior center, and then delivered on foot to individual homes of sick or homebound older persons. The other deliveries are for the congregate meals program where older persons come to eat in the senior center dining room.

Most non-peak hour trips generated by the project would also be pedestrian and transit trips. Trips to the senior center would mostly be from neighborhood residents and employees who would walk to the center from another center in the area./6/

Parking

Under City Planning Code Section 151, the project would be required to provide 14 parking spaces (see Zoning Impacts, p. 39). The project would provide 12 spaces; a variance to the code would be required. The 12 spaces provided would be adequate to meet demand created by the project as almost all trips would be made by walking and transit. A recent survey of parking usage at four, lower income housing developments located in the Chinatown area indicated an auto ownership ratio of .0075 autos per dwelling unit./7/ At this ratio, there would be a demand for one parking space from residents of the project. In addition, one space would probably be needed by the resident manager (see mitigation measure on p. 69). Vans would deliver prepared food to the senior center at 10:40 a.m., 11:30 a.m. and 3:30 p.m. These vans and other service vehicles would use the plaza parking area or garage for loading and unloading.

● Users of the senior center and employees would not increase parking demand as almost all trips would be made by walking or by transit./5/ Assuming one out of every four apartment units has a visitor who has driven to the area on a given day or evening, visitors to project residents would increase parking demand in the area by an estimated 18 vehicles. This would most likely occur on weekends and in the evenings when the area-wide demand for parking is at its peak. Visitor parking would be allowed in the project's garage if spaces are not needed by project residents; this would help to minimize the increase in parking demand from the project.

The parking garage and plaza would be accessible from a driveway on Upper Broadway about 30 ft. west of its intersection with Mason St. (see Figures 2 and 4, pp. 14 and 16).

There is adequate distance from Mason St. such that vehicles would not interfere with the Cable car line operations. This would not result in increased hazard to pedestrians as there is no sidewalk on the project side of Upper Broadway. After construction, Lot 42 would continue to be used as access to the Alfred's Restaurant parking area.

NOTES - Transportation, Circulation and Parking

/1/ Construction impacts are based on information supplied by Bob Yee, Director of Pineview Housing Corporation.

/2/ Volumes in the Broadway Tunnel are based on San Francisco Department of Public Works counts taken on Tuesday, February 7, 1984, Wednesday, February 8, 1984 and Thursday, February 9, 1984.

/3/ The intersection of Mason St./Upper Broadway was counted on Thursday, April 10, 1986. see Appendix C p. A-44 for methodology. The analysis considered the effect of cable car operations on the intersection service level.

/4/ A daily trip generation rate of four trips/unit was used for each elderly residential unit, based on Caltrans District 04, Sixth Progress Report on Trip Generation Research Counts, 1970. Modal splits for the residential portion of the project were based on retail modal splits as the residential units would be for elderly low income people and most trips would be for shopping. Retail mode splits are from San Francisco Department of City Planning, Transportation Guidelines for Environmental Review: Transportation Impacts, September 1983.

/5/ A trip generation rate of 73.2 trips/1,000 gsf was used for the senior center, based on a survey of a similar center at 640 Pine St. conducted on April 30, 1986. Modal splits for the senior center were also based on this survey.

/6/ Yvonne Lee, Self Help for the Elderly, telephone conversation, June 24, 1986.

/7/ This survey was conducted by the Pineview Housing Corporation in December 1985; this survey is on file and available for public review at the Office of Environmental Review, Department of City Planning, 450 McAllister St., San Francisco.

D. CONSTRUCTION NOISE

Ambient noise in the project vicinity is typical of urban settings, where noise levels are dominated by vehicular traffic. Primary noise sources are the motor vehicle traffic on Mason St. and Upper Broadway; motor vehicle traffic in the Broadway Tunnel, and cable cars operating on Mason St. Sidewalk noise measurements taken during a weekday morning show average noise levels of about 74 dBA on the Mason St. bridge in front of the City District Health Center No. 4 and about 71 dBA in front of Our Lady of Guadalupe Church on Upper Broadway. These high, mid-morning noise levels indicate that 24-hour averaged noise levels at the project site would exceed 60 dBA, L_{dn}.

Project construction would take place over about 14 months, and would increase noise levels in surrounding areas. Construction noise levels would fluctuate, depending on construction phase, equipment type and duration of use, distance between noise source and listener, and presence or absence of barriers between noise source and listener. To estimate probable noise impacts, this analysis assumes typical equipment and construction techniques. Table 3, below, shows typical exterior noise levels associated with the different phases of construction (see Appendix D, p. A-45, for a table of typical noise levels found in the everyday environment). With windows open, interior noise levels at 50 ft. from the noise source would be about 10 to 15 dBA less than those shown in Table 3. Closed windows would reduce noise levels by about 20 to 25 dBA below those shown in the table.

No piledriving would be required during project construction. Construction noise is regulated by the San Francisco Noise Ordinance (Article 29 of the City Police Code). The ordinance requires that sound levels of construction equipment other than impact tools not exceed 80 dBA at a distance of 100 ft. from the source. Impact tools (jackhammers, impact wrenches) must have both intake and exhaust muffled to the satisfaction of the Director of Public Works. Section 2908 of the Ordinance prohibits construction work at night, from 8 p.m. to 7 a.m., if noise would exceed the ambient noise level by five dBA at the project property line, unless a special permit is authorized by the Director of Public Works. Any night-time construction activity could disturb nearby residents.

Noise-sensitive land uses in the project vicinity include single family and multi-family residences, Our Lady of Guadalupe Church, the City District Health Center No. 4, and the Jean Parker Elementary School.

● TABLE 3: TYPICAL COMMERCIAL/INDUSTRIAL CONSTRUCTION NOISE LEVELS, 50 FEET FROM SOURCE

Construction Phase	Duration of Phase/a/(weeks)	Average Noise Level (dBA)
Site Preparation	12	84
Foundations	12	78
Erection	8	85
Exterior Finishing	12	89

/a/ Some phases of construction would overlap.

SOURCE: Bolt, Beranek and Newman, December 31, 1971, Noise from Construction Equipment and Home Appliances, Environmental Protection Agency

The nearest residential structures lie about 25 ft. south of the project site. Other residential structures lie about 35 ft. north of the site across Upper Broadway. During the noisiest phases of construction, interior noise at the closest residences would be about 85 dBA, Leq with the windows facing the proposed structures open and about 75 dBA, Leq with those windows closed. During this same construction phase, interior noise levels in residences on Upper Broadway would be about 82 dBA, Leq with the windows open, and 72 dBA, leq with the windows closed.

Noise at levels greater than 60 dBA can interfere with normal speech and concentration; noise at levels greater than 70 dBA would require residents to close windows or shout to communicate. Intermittent noise, such as noise generated by impact tools, reduces perception of control over the environment. This perceived loss of control frequently results in a depressed mood and depressed motivation. It has also been shown that high noise levels can lead to elevated blood pressure./4/ Repeated loud impulse and intermittent sounds appear more likely to disrupt performance than continuous or steady sounds of comparable level./5/ During the noisiest 16 weeks of construction (see Table 3), interior noise levels at the residential structures within about 45 ft. from the project site would exceed 70 dBA, with the windows closed, interfering with speech and concentration.

Our Lady of Guadalupe Church, which is located about 50 ft. north of the project site, would also experience high noise levels intermittently during construction. Interior noise measurements indicate that the Church's structure attenuates exterior noise levels by about 20 to 25 dBA./1/ Thus, interior noise levels during the noisiest phase of construction would be about 64 to 69 dBA, Leq. Since noise levels over 60 dBA may be considered annoying, and can interfere with concentration, noise levels generated by construction could disrupt worship services and would reduce the Church's capacity to function as a place of reflection between regularly scheduled services. Masses are scheduled for 7:30 a.m. every weekday, for 4:30 p.m. on Saturdays, and for 8 a.m., 9 a.m., 10:15 a.m., and 12:15 p.m. on Sundays. In addition, services are scheduled for 7:30 a.m., 12 noon, and 7 p.m. on Catholic holy days celebrated on various days throughout the year (approximately ten during a 14-month period). The services generally last about one hour. A mitigation measure proposed as part of the project would limit construction to times when regular services are not scheduled. However, even with this mitigation measure, the Church's function as a place of reflection would be disrupted for a total of about six of the scheduled 14 months of construction activity.

Church officials have expressed concern over the effect of project construction-related vibration on the frescoes inside the building. Frescoes, having been painted on the plaster of the wall itself (as opposed to normal canvas paintings), are vulnerable to vibration. The project would not include piledriving, and thus the high noise and vibration that accompanies pile driving would not occur. However, vibration resulting from foundation work and the use of impact tools, such as jackhammers and pneumatic wrenches, might potentially be transferred to the Church's facade with an undetermined effect on the frescoes. Pre-construction, on-site, vibration testing of impact tools would provide information on this potentially adverse effect and would identify a need for a more extensive vibration study (See mitigation measure on p. 70).

The City District Health Center No. 4 is located about 90 ft. east of the proposed structure, across Mason St. Exterior noise levels generated by project construction would be attenuated by distance to about 84 dBA Leq during the noisiest phase of construction. The windows on the west side of the City District Health Center No. 4 (facing the project) do not open, thus providing about 20 dBA noise attenuation. During the noisiest phase of construction, noise levels inside the offices of City District Health Center No. 4, facing Mason St., would exceed 60 dBA Leq, which could be considered annoying by patients and workers and could interfere with concentration.

The Jean Parker Elementary School is located on Broadway about 300 ft. east of the proposed structure. Attenuation with distance would reduce noise levels during the noisiest phase of construction to about 73 dBA. For much of the school, the effect of intervening structures would further reduce construction-related noise to near ambient levels. Thus, project construction-generated noise would not be expected to noticeably affect the school or any of its related functions.

No other projects in the vicinity are scheduled to begin construction concurrently with the project. Thus, no cumulative construction noise impacts would be expected.

In summary, during most of the construction activity, noise levels would be expected to be above existing levels in the area. There would be times when noise would interfere with indoor activities in nearby residences, Our Lady of Guadalupe Church, and City District Health Center No. 4.

In order to reduce construction noise impacts of the project, the sponsors and general contractor would agree to mitigation measures as outlined in the Mitigation section of this report.

NOTES - Construction Noise

/1/ Noise measurements were taken between 9 a.m. and 10:30 a.m. on Tuesday, May 20, 1986, by Environmental Science Associates, Inc.

/2/ A decibel (db) is a logarithmic unit of sound energy intensity. Sound waves, traveling outward from a source, exert pressure that is mathematically expressed as sound pressure level (commonly called "sound level") in units of decibels. A dBA is a decibel corrected for the variation in frequency response of the typical human ear at commonly encountered noise levels.

/3/ Environmental noise fluctuates in intensity over time, and is typically described as a time-averaged noise level. Leq, the energy equivalent noise level, is a measure at the average energy content (intensity) of noise over a given period. L_{dn}, the day-night average noise level measurement, is based on human reaction to cumulative noise exposure over a 24-hour period, which takes into account the greater annoyance of nighttime noises. Noise between 10 p.m. and 7 a.m. is weighted 10 dBA higher than daytime noise.

/4/ Sheldon Cohen, et al., "Cardiovascular and Behavioral Effects of Community Noise," American Scientist, Volume 69, October 1981.

/5/ National Institute for Occupational Safety and Health, "Occupational Exposure to Noise," U.S. Department of Health, Education and Welfare, 1972.

E. AIR QUALITY

Upon completion, the project could affect local air quality by the redistribution of vehicle emissions inside the Broadway Tunnel, because of the effective extension of the tunnel's east end, caused by closing the existing open air space west of Mason St. This could change the operational effectiveness of the existing ventilation system in the tunnel.

Sensitive receptors in the project vicinity who could experience a change in air quality due to the redistribution of vehicle emissions from the Broadway Tunnel as a result of the project, include: residents adjacent to the existing tunnel opening west of Mason St.; residents and school children east of City District Health Center No. 4; employees and patients at City District Health Center No. 4 and pedestrians, bicyclists, and motorists who use the tunnel.

Broadway Tunnel Characteristics

Completed in the early 1950's, the Broadway Tunnel extends through Russian Hill for a length of about 1,616 feet from portal to portal. The tunnel consists of two physically separate tunnels, or bores; the northern bore contains two lanes of westbound traffic and the southern bore contains two lanes of eastbound traffic. Adjacent to the outside wall of each bore, is a sidewalk for pedestrian use. In cross-section, the form of each bore is that of a semi-circle with a radius of about 14.25 feet, and a total cross-sectional area of about 880 square feet. In 1973, the City's District Health Center No. 4 building was completed, bridging the tunnel roadway just east of Mason St.

Westbound traffic passes first beneath City District Health Center No. 4 and then the Mason St. Bridge. Unlike the separate bores of the Broadway Tunnel, however, westbound and eastbound traffic are separated by only a median strip when traveling beneath City District Health Center No. 4 and the Mason St. Bridge.

Between the Mason St. Bridge and the Tunnel's East Portal (a distance of about 160 feet), Broadway is uncovered (the project site) with support walls on either side. The project would cover this 10,640 sq. ft. area (see Figure 16, p. 60). Contiguous cover of Broadway would increase from about 1,616 feet to about 2,004 feet. (This would include the Broadway Tunnel and the span east of the Broadway Tunnel that is currently covered by the Mason St. Bridge and City District Health Center No. 4 and the span that would be covered by the project).

Broadway Tunnel Ventilation

The principle force responsible for ventilation of the Tunnel is movement of motor vehicles. The vehicles push air into the tunnel as they enter and continue to push air forward until air is pushed out when the vehicles exit the tunnel. While passing through, a given vehicle emits pollutants which are in turn pushed out of the tunnel by vehicles that follow. The rate of air renewal in the tunnel is roughly proportional to the average speed and number of vehicles. At a given speed, heavy traffic volumes push air into and out of the tunnel at a faster rate than lower traffic volumes, helping to offset the increased emissions released by the greater traffic volumes.

To enhance air circulation provided by moving vehicles, the Tunnel contains four fans, two housed in each of two ventilation buildings. These buildings are located above the Tunnel, one at either end. Air is drawn through louvers located in each ventilation building and pumped into each bore of the Tunnel, in the direction of motor vehicle travel, through ducts attached to the ceiling. Thus, the West Ventilation Building pumps air into the southern bore (eastbound traffic) and the East Ventilation Building pumps air into the northern bore (westbound traffic). Normally, the fans operate from about 6 a.m. to 2 p.m., weekdays (although they may be left on periodically at the discretion of city personnel responsible for tunnel maintenance and operation)./1/

Carbon Monoxide (CO) Sampling In and Around the Broadway Tunnel

CO concentrations in urban areas normally consist of a composite concentration consisting of background and local CO components. The background concentration arises from regional traffic characteristics and other factors, while the local concentration is a product of traffic emissions in the immediate area. In the Broadway Tunnel area, then, background CO combines with CO generated locally on streets such as Powell, Mason, and Broadway to give the composite CO concentration at any given location.

CO concentrations were sampled by the BAAQMD in and around the Broadway Tunnel on Friday, January 24, 1986 from about 5 p.m. to 9 p.m./4/ The specific locations of sampling and their associated CO concentrations are shown in Figure 16 p. 60. The instrument used was portable, which allowed for gathering information on CO levels at various locations during a short period of time, with the benefit of relatively constant meteorological and traffic conditions. The State CO concentration standard for one hour is 20 ppm; no violations of this standard were observed, even instantaneous readings did not reach the level of 20 ppm.

Weather. A high pressure system moved through the Bay Area region on January 24, 1986. It brought no precipitation and lighter-than-normal winds. During the evening period from 5 p.m. to 9 p.m., the average wind speed recorded at the BAAQMD's Ellis St.

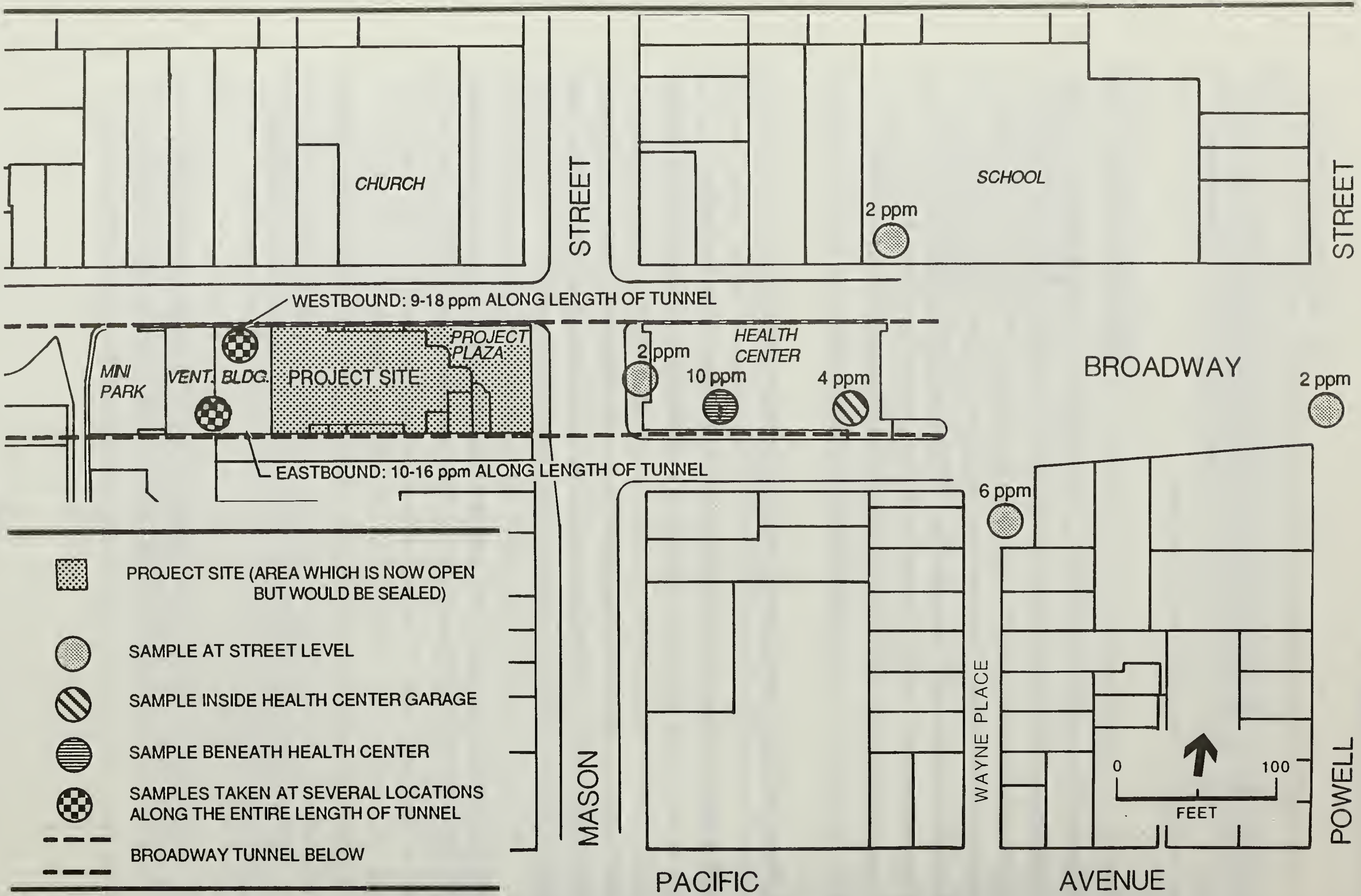

CHURCH
STREET
SCHOOL
2 ppm
STREET
WESTBOUND: 9-18 ppm ALONG LENGTH OF TUNNEL
MINI PARK
VENT. BLDG.
PROJECT SITE
PROJECT PLAZA
2 ppm
HEALTH CENTER
10 ppm
4 ppm
BROADWAY
2 ppm
EASTBOUND: 10-16 ppm ALONG LENGTH OF TUNNEL
6 ppm
PROJECT SITE (AREA WHICH IS NOW OPEN BUT WOULD BE SEALED)
SAMPLE AT STREET LEVEL
SAMPLE INSIDE HEALTH CENTER GARAGE
SAMPLE BENEATH HEALTH CENTER
SAMPLES TAKEN AT SEVERAL LOCATIONS ALONG THE ENTIRE LENGTH OF TUNNEL
BROADWAY TUNNEL BELOW
MASON
WAYNE PLACE
0
100
FEET
POWELL
PACIFIC
AVENUE

FIGURE 16

BROADWAY TUNNEL AREA CO CONCENTRATIONS

PINEVIEW

SOURCE: BAAQMD MOBILE CO SAMPLING, JAN 24, 1986 monitoring station was 3.3 miles per hour compared to an average winter wind speed of 4.7 miles per hour. During this same period, the average wind speed recorded at the BAAQMD's 23rd St. monitoring station was two miles per hour compared to an average winter wind speed of 3.9 miles per hour. In the Broadway Tunnel area, very light wind conditions were observed during the testing period./2/ Typically, with light winds and especially during winter months, increasingly stable air conditions are observed near ground level. Stagnant, very stable conditions confine CO emitted on ground level and thus produce higher measured CO concentrations. (The highest eight-hour average CO level measured at the 23rd St. station on January 24 was 2.6 ppm which equals the mean highest daily eight-hour average CO level for the month of January./3/)

Based on the day's wind data and observations of the CO monitoring team, the CO sampling in and around the Broadway Tunnel on January 24, 1986 occurred during a typical winter evening in regard to air pollution dispersion which means that atmospheric conditions were relatively stagnant compared to atmospheric conditions observed over the course of an entire year.

Broadway Tunnel Traffic. Based on vehicle counts taken by City staff during February, 1984, the heaviest hourly traffic volumes pass through the Broadway Tunnel on weekday mornings. Between 8 a.m. and 9 a.m. weekdays (normally the peak-hour for the day) the ratio of eastbound to westbound traffic is about 2.5 to 1.0 due primarily to the influx of workers to the Downtown area. During the afternoon peak-hour (5 p.m. to 6 p.m.) vehicle counts are typically less than morning peak-hour counts, and westbound traffic outnumbers eastbound traffic by a ratio of about 1.8 to 1.0.

Traffic counts for Saturday and Sunday indicate that weekend traffic volumes through the Broadway Tunnel are less than weekday traffic volumes. Moreover, weekend traffic volumes are more evenly distributed over the 24-hour period. (While there is an increase in traffic in the tunnel during the early and late evening on Friday and Saturday nights, traffic volumes are less than during the morning or afternoon peak hours of a weekday).

As stated above, CO sampling in and around the Broadway Tunnel was undertaken by the BAAQMD on a Friday evening from about 5 p.m. to 9 p.m. This time period includes the afternoon peak-hour during which, typically, the second highest hourly traffic volume passes through the tunnel (the highest hourly volume is between 8 a.m. and 9 a.m.

weekday mornings). Furthermore, Friday evening traffic volumes are generally higher than during other weekday evenings. CO was sampled in the evening as the highest levels occur in evenings after concentrations have built up over time.

Carbon Monoxide (CO) Measurements. Five measurements were taken outside of the tunnel (see Figure 16 p. 59); these measurements indicated CO concentrations ranging from 2ppm to 6ppm. The concentrations of CO measured, and its distribution, indicates that CO levels in the Broadway Tunnel area (excluding the Tunnel itself) do not differ significantly from those monitored at the BAAQMD's 23rd St. station on Potrero Hill./5/ Appendix E (p. A-46) contains a summary of air quality data (including CO) compiled at that station. CO standards have been violated at the 23rd St. station only once in the past four years, and violations in the Broadway Tunnel area would probably be similar.

The measurements taken along the entire length of the tunnel indicate CO concentrations ranging from 9 ppm to 18 ppm. The peak readings indicate the instantaneous effects on CO levels of older or more polluting motor vehicles./6/ The confining nature of the tunnel itself results in CO concentrations several times higher than background levels. Tunnel fans were not operating during the late afternoon and early evening hours of January 24, 1986, the day when CO measurements discussed above were taken./7/

Project Effects on Sensitive Receptors

The existing tunnel opening between the East Ventilation Building and the Mason St. Bridge would be completely sealed by the project, preventing any emissions generated in the Tunnel from affecting future project residents.

As discussed previously, the principle force responsible for ventilation is the movement of the motor vehicles themselves. When the rate of air renewal is slow (for example, with low traffic volumes), a greater percentage of emissions diffuse through the existing opening at the project site than when the rate of air renewal is greater. For low traffic volumes, the percentage of emissions that diffuse through the existing opening (of the total emissions that diffuse east of the tunnel) has been estimated at 10% to 15%./8/ The remaining 85% to 90% diffuses into the atmosphere east of City District Health Center No. 4. Rapidly moving heavy traffic volumes push air into and out of the tunnel at a faster rate than lower traffic volumes, helping to offset the increased emissions released by the greater traffic volumes. This phenomenon is demonstrated by the CO sampling conducted by the BAAQMD in January, 1986. Although traffic data for the particular Friday evening when CO measurement took place is not available, traffic data compiled for the Broadway tunnel during other week days indicates that during the early evening hours, traffic westbound amounts to about double the volume eastbound. Nevertheless, the measured CO levels were about equal for both tubes.

The CO measurements illustrated in Figure 16, p. 60, support the estimation that only a small fraction of the air emitted from the Tunnel diffuses into the atmosphere through the existing opening over which the project would be constructed, and that the majority of the air diffuses into the atmosphere after passing easterly beneath the City's District Health Center No. 4. If a substantial amount of diffusion were taking place through the existing opening, then the CO measurement taken at street level in front of the City's District Health Center No. 4 would have been expected to be greater than the 2 ppm that was actually measured. Also, the CO measurement beneath the City's District Health Center No. 4 would have been expected to be less than 10 ppm. Thus, with the project covering the span from the East Ventilation Building to the Mason St. Bridge, the CO concentration that would be diffused east of City District Health Center No. 4 (about 390 ft. east of the site), may not change measurably, and even under the most conservative conditions would not cause CO concentrations to increase by more than a few parts per million.

Given a worst-case, one-hour average, background level of 10 ppm/8a/, worst-case instantaneous readings inside the tunnel would range from 15 ppm to 24 ppm. On the assumption that the one-hour average CO levels inside the tunnel would be a value within the range projected for instantaneous readings, the worst-case, one-hour average, inside the tunnel would be between 15 ppm and 24 ppm. The project, at worst, has been estimated to increase CO levels east of the tunnel's east portal by 15%, based on a City engineer's estimate of 10% to 15% diffusion through the existing air space. Thus, worst-case, one-hour average CO levels inside the tunnel would increase to a range of 16 ppm to 26 ppm as a result of the project. (Background level is still 10 ppm, and the tunnel increment is estimated at 15% greater than the existing tunnel increment.) The BAAQMD engineer who took the instantaneous readings observed that the high values within the range of CO levels were caused by older, more polluting vehicles as they passed the CO monitor. The one-hour average CO level would probably be closer to the low end of the range of recorded CO levels with the project, because the peak readings indicate the instantaneous effects of CO levels of trucks and older or more polluting motor vehicles (see p. 62); thus, the worst-case one-hour average CO level inside the tunnel would probably be below the state one-hour average CO standard, 20 ppm. Nearby sensitive receptors would not be exposed to this level, however, since tunnel emissions are dispersed upon exiting east of Health Center No. 4. The CO measurements illustrated in Figure 16 indicate that dispersion of tunnel emissions (due primarily to movement of air by vehicle movement and connection currents) east of Health Center No. 4 is fairly rapid. The CO measurement at Wayne Place which is just south and east of Health Center No. 4 was about two-thirds of the lowest CO reading taken inside the tunnel. CO readings taken at the Jean Parker Elementary School and the intersection of Powell St. and Broadway were less than one-fourth the lowest CO reading taken in the tunnel.

● Although the precise fluctuation of CO levels inside the tunnel over an eight-hour period is not known, it is probable that under worst-case conditions when background levels are about 7 ppm,/8a/ eight-hour average, CO levels inside the tunnel would exceed 9 ppm, which is the ambient CO standard for eight-hour exposure to CO. However, no one remains in the tunnel for an eight-hour period, to be affected by an occasional exceedance that might occur under worst-case conditions, other than tunnel operators who work inside the ventilation buildings. Air quality standards for the work place (in this case, for tunnel operators) are generally higher than ambient standards. For carbon monoxide, the Threshold Limit Value listed by the American Conference of Governmental Industrial Hygienists is 50 ppm, eight-hour average, which is several times the worst possible eight-hour average inside the tunnel./8b/ The worst-case analysis makes use of CO levels that correspond to the most stagnant atmospheric conditions. If no exceedence is estimated to occur under these conditions, there is no need for seasonal or year-long study when atmospheric conditions are less stagnant and CO levels would be necessarily lower. No sensitive receptors outside the tunnel are exposed to an eight-hour average exceeding 9 ppm, due to tunnel emissions, even under worst-case conditions due to dispersion of tunnel emissions with outside air at the tunnel exit and due to shifting winds that occur over an eight-hour period which would distribute tunnel emissions over a wide area. This would also be true with the project. Also, unlike the worst-case one-hour CO levels estimate described above, it is probable that, over a worst-case eight-hour period, the ventilation fans would be in operation. Fans help to push emissions out of the tunnel and, in the process, effectively dilute those emissions reducing their concentration.

The CO sampling shown in Figure 16 is representative of afternoon peak-hour traffic conditions and typical winter evening meteorological conditions. During the morning peak-hour, usually between 8 a.m. and 9 a.m., traffic may accumulate west of the Broadway and Powell St. intersection and back-up into the tunnel. The project would close the existing opening which provides a limited amount of diffusion for the emissions of motor vehicles idling between the Mason St. Bridge and East Portal. However, tunnel fans normally operate from about 6 a.m. until 2 p.m., weekdays, to reduce the possibility of a build-up of unhealthy levels of CO.

In the event of virtually no air renewal inside the tunnel, such as an accident blocking both lanes of traffic in one of the tunnel's bores, emissions would accumulate resulting in high pollutant concentrations. This in an existing potential hazard which would not change with the project, because with virtually no air movement within the tunnel, virtually no emissions can diffuse through the existing opening at the project site.

Since it appears that a minimal amount of air diffuses through the existing opening over which the project would be constructed, time-averaged CO levels within the tunnel itself would not be expected to be worse than existing levels, which as indicated by the measurements taken in January, are well within State CO standards.

Increasingly stringent federal and state emissions standards for new cars and trucks and the state-mandated biennial Inspection and Maintenance (I/M) program will result in fewer emissions per motor vehicle per mile of travel in the future. Between the years 1985 and 1990, CO emissions per motor vehicle per mile are expected to decline about 30%./9/ This decrease is likely to more than compensate for increases in traffic in the area between 1985 and 1990. Especially in San Francisco, where almost all of the CO is due to motor vehicles, future CO levels are therefore predicted to be lower in the future. Thus, vehicle emissions in the Broadway Tunnel would also be expected to decline in accordance with city-wide and area-wide trends.

Lead Emissions in Broadway Tunnel

Besides gases, motor vehicle exhaust contains particulate matter. These particulates are composed of different chemical constituents, and in the case of motor vehicles that use regular gas, a fraction of the particulate matter is lead. Exposure to high levels of lead has been shown to impair blood function and nerve construction which, in children especially, can produce behavioral and learning problems./9/ Ambient levels of lead have been decreasing due to the increasing percentage of motor vehicles that must use unleaded fuel. Table E-1, Appendix E, shows that no violations of the state lead standard have been recorded in San Francisco during the past four years.

Although no lead concentration studies have been made for the Broadway tunnel area, the increasing percentage of motor vehicles that run exclusively on unleaded fuel will reduce existing lead emissions over time. Assuming a proportion (of trucks and autos) typical of major city arterials, about 20% of the vehicle miles traveled through the Broadway Tunnel were generated by vehicles using regular (leaded) gasoline in 1985. By 1990, this percentage will decrease to about six percent and, by 1995, to about two percent./10/ Since, as discussed previously, the project would have a minimal effect on CO concentrations east of City District Health Center No. 4, it would also have little or no effect on lead levels east of Health Center No. 4, where the Jean Parker Elementary School is located.

Effect of Project on Broadway Tunnel Ventilation System

The ventilation system, as discussed previously, depends upon the motion of motor vehicles. From 6 a.m. through 2 p.m. staff is available on-site to operate the fans which assist in tunnel ventilation. The project could restrict air flow by forcing the air that exits the southern bore and any air which may diffuse upward through the opening at the project site into the narrow cross-section of air space beneath the City's District Health Center No. 4./11/ Unlike the rest of the tunnel, the air space beneath the City's District Health Center No. 4 is held in common between eastbound and westbound traffic. Thus, air exiting the southern bore is not confined to the eastbound air space beneath the City's District Health Center No. 4, but instead can diffuse into the westbound side where it can be recirculated into the northern bore. It is probable that some recirculation of stale eastbound air into the westbound tube occurs under existing conditions. As CO measurements indicate that little of the air exiting the eastbound tube diffuses upward through the open air space over which the project would be built, it is not likely that construction of the project would increase the recirculation of stale eastbound air. The project would not be expected to affect the tunnel's ventilation system. A mitigation measure including a monitoring program to detect changed CO concentrations in the tunnel, and appropriate mitigation measures to be implemented if a substantial increase in CO concentrations were detected (construction of a wall and an additional fan) are included in the project (see p. 71).

NOTES - Air Quality

/1/ David Conci, Maintenance Superintendent, Department of Public Works, Broadway Tunnel Tour, June 16, 1985.

/2/ Dick Duker, Engineer, Bay Area Air Quality Management District, telephone conversation, October 14, 1986.

/3/ Bay Area Air Quality Management District, Contaminant & Weather Summary, January 1986.

/4/ The Sampling instrument used by the BAAQMD was General Electric's Portable CO Analyzer (15EC5--3C03), which was calibrated before the start of sampling and checked immediately afterwards to ensure accurate results.

/5/ Dick Duker, Engineer, Bay Area Air Quality Management District, transmittal received, June 9, 1986.

/6/ Dick Duker, Engineer, Bay Area Air Quality Management District, telephone conversation, June 11, 1986.

/7/ David Conci, Maintenance Superintendent, Department of Public Works, telephone conversation, August 5, 1986.

/8/ Vijay Gupta, Mechanical Engineer, Department of Public Works, telephone conversation, January 6, 1986.

● /8a/ Milton Feldstein, Air Pollution Control Officer, Bay Area Air Quality Management District, letter, December 11, 1986.

● /8b/ American Conference of Governmental Industrial Hygienists, Threshold Limit Value, and Biological Exposure Indices for 1985-86, 1985.

/9/ Bay Area Air Quality Management District, Air Quality and Urban Development: Guidelines for Assessing Impacts of Project and Plans, November, 1985.

/10/ Percentages of vehicle miles traveled by motor vehicles using leaded gasoline is based on California Air Resources Board (EMFAC7B) vehicle emission factors, released in March, 1986.

/11/ David Conci, Maintenance Superintendent, Department of Public Works, telephone conversation, July 1, 1986.

F. GROWTH INDUCEMENT

The project would add 70 residential units, about 4,700 gsf social lounge and multi-purpose/dining space for senior citizens, about 3,485 gsf of open space (about 800 gsf of which would be on private terraces), and 12 parking spaces. About 77 residents would be housed at the site. The project would provide housing exclusively for low-income senior citizens and physically handicapped persons. Occupants of the proposed project could include tenants relocating from other locations in the Chinatown and North Beach areas and tenants from other areas of San Francisco. New residents on the site would not be expected to be residents new to San Francisco. If the project were fully leased, however, and the residential space of the project did not create permanent vacancies in other such buildings, the number of total residents in San Francisco could increase by about 77 people due to the project.

The project could have growth-inducing effects by demonstrating a demand for low-income residential housing in this area. This could thereby encourage similar development on lots currently vacant or occupied by underused buildings in the Chinatown-North Beach area. In that there are a limited number of such sites as this available in the area or in the City and limited funding available for subsidized elderly housing, it is unlikely that the project would encourage further development of this type.

As there could be a net increase in residents, there could be an increase in the demand for retail goods and business service in the project area. Some of this demand would be satisfied by the facilities and services which would be provided as part of the project such as the meal program. Some of the project's occupants would be relocating from other housing in the area and thus would already be using existing services in the Chinatown area.

The project would be built in a developed urban area, and no expansion to the municipal infrastructure not already under consideration would be required to accommodate new development due to, or induced by, the project.

Rezoning of the project site from RM-2 (Residential Mixed, Moderate Density) to RM-4 (Residential Mixed, High Density) could set a precedent for similar rezoning of property in the area. The Department of City Planning has recently conducted planning studies of the nearby Chinatown area and is examining permanent zoning proposals for the Chinatown area. The City Planning Commission, in approving or disapproving this project and any rezoning proposals prepared by the Planning Department, will provide direction for development in the area.

V. MITIGATION MEASURES PROPOSED TO MINIMIZE THE POTENTIAL ADVERSE IMPACTS OF THE PROJECT

In the course of project planning and design, measures have been identified that would reduce or eliminate potential environmental impacts of the proposed project. Some of these measures have been, or would be, adopted by the project sponsor or project architects and contractors and thus are proposed; some are under consideration; and some have been rejected. Implementation of some may be the responsibility of public agencies. Measures under consideration or measures rejected by the sponsor may be required by the City Planning Commission as conditions of project approval.

Each mitigation measure and its status are discussed below. Where a measure has not been included in the project, the reasons for this are discussed. Any or all of the measures not included in the project could be required by the City Planning Commission to be included in the project as conditions of approval, should the project be approved. Mitigation measures below preceded by an asterisk (*) are from the Initial Study (see Appendix A, p. A-2).

VISUAL QUALITY

MEASURE PROPOSED AS PART OF THE PROJECT

- In order to reduce obstrusive light or glare, the project sponsor would use no mirrored glass on the building.

TRANSPORTATION, CIRCULATION AND PARKING

MEASURES PROPOSED AS PART OF THE PROJECT

● - Parking spaces in the project would be for use by project residents. Visitors of project residents and to the senior center (such as visiting health workers, meal delivery vans, etc.) could be allowed to use the spaces if it were found that the parking demand from project residents was insufficient to fill all the spaces. Building management would ensure that parking spaces in the project are not used for all-day commuter parking by visitors or staff of the senior center, or by staff of the Self Help for the Elderly programs.

- The project sponsor and construction contractor would meet with, and follow the recommendations of, the Traffic Engineering Division of the Bureau of Engineering of the Department of Public Works, the Fire Department, the Police Department, Muni, the Department of City Planning, and Caltrans to determine feasible traffic mitigation measures to reduce traffic congestion during construction of the project. These would include times at which to close lanes in the Broadway Tunnel (at a maximum lanes would be closed from 9 a.m. to 3 p.m.), the method for diverting traffic from two lanes to one, and warning signs placed at key decision points in order to divert motorists to alternative routes. Necessary permits would be obtained for all warning signs and the signs would be placed at locations where routing decisions through the Broadway Tunnel are made, such as at Broadway and Columbus, Broadway and Kearny, Broadway and Van Ness, and on the Embarcadero Freeway prior to the Washington Street exit.

- The project sposor would require the contractor to limit deliveries to the site by trucks to between the hours of 9 a.m. and 3 p.m., Monday through Friday, to minimize potential conflicts between trucks and peak period traffic.

- Signs informing pedestrians of walkway closures inside the tunnel and sidewalk closures on Mason St. would be placed at the two crosswalks closest to the tunnel openings (Powell and Larkin St.) and the two crosswalks closest to the project site (Pacific and Upper Broadway) to allow pedestrians proceeding through the tunnel and on Mason St. to cross safely at these crosswalks.

- Closure of the parking lane and sidewalk of southbound Mason St. adjacent to the site would be necessary during the estimated one-year construction period. All truck deliveries and other construction-related activities would be accommodated either on the project site or within the closed parking lane of Mason throughout all phases of construction. The project sponsor and the construction contractor would ensure that no blockage of the Mason St. cable car tracks or of Upper Broadway traffic lanes occurs during the construction period.

MEASURES UNDER CONSIDERATION BY PROJECT SPONSOR

- The project sponsor could require the contractor to provide off-site parking (at another location) for construction workers, and to provide for transportation of workers to the site.

- The project sponsor would consult with the Department of Public Works to provide a temporary curb cut to the lot used by Alfred's Restaurant, in order to permit continued use of the parking lot during the construction period.

NOISE

MEASURES PROPOSED AS PART OF THE PROJECT

- The construction contract would require that the project contractor muffle and shield intakes and exhausts, shroud or shield impact tools, and use electric-powered rather than diesel-powered construction equipment, as feasible, so that noise would not exceed limits stated in the City's Noise Ordinance (Article 29, of the San Francisco Police Code).

- The project sponsor would require the general contractor to construct barriers around the site, and around stationary equipment such as compressors, which would reduce construction noise by as much as five dBA.

*- The project sponsor would retain an acoustical consultant to design noise insulation measures to ensure that the building would comply with Title 25 and the Master Plan. The acoustical analysis would also recommend appropriate measures to reduce noise levels in the building's front plaza to levels which are acceptable to HUD or obtain a waiver from HUD of the exterior noise criteria, due to cable car operations. A copy of this report would be submitted with the building permit application.

- The project sponsor would require the general contractor to limit the hours of construction to those from 9 a.m. to 6 p.m., Monday through Friday, to reduce noise impacts on nearby residential and church land uses. Construction also would not be scheduled between 11:30 a.m. and 1:30 p.m. on holy days of the Catholic Church calendar.

- The project sponsor would require the general contractor to test for vibrations at the Church facade due to operation of impact tools. Such pre-construction testing would determine whether there would be a need for further study of construction-generated vibration. If necessary, such a study would be undertaken by the project sponsor to identify measures to protect the frescoes within the church. The results of the vibration testing would be submitted to the Archdiocese of San Francisco, the Landmarks Preservation Advisory Board, the project sponsor, and would be on file and available for public review at the Department of City Planning, 450 McAllister St., San Francisco.

● - During the construction period, in the event that a construction activity reasonably appears to be causing an adverse effect on the frescoes or facade of Our Lady of Guadalupe Church, construction activity would cease immediately and a licensed structural or civil engineer (not associated with any firm having contracts related to project construction) would be hired by the project sponsor to determine whether or not there was a substantial adverse effect.

AIR QUALITY

MEASURES PROPOSED AS PART OF THE PROJECT

*- The project sponsor would require the general contractor to maintain and operate construction equipment so as to minimize exhaust emissions of TSP and other pollutants, by such means as a prohibition on idling motors when equipment is not in use or when trucks are waiting in queues, and implementation of specific maintenance programs (to reduce emissions) for equipment that would be in frequent use for much of a construction period.

- Prior to the start of any construction activity the Department of Public Works would monitor CO concentrations (along the entire length of the tunnel) daily (including measurements taken during the p.m. peak hour), for a period of not less than 45 days. Once the slab base of the project were in place (closing off the opening), the Department of Public Works would undertake another monitoring program to last for a similar period of time as the first. If comparison of the two sets of data from the two monitoring programs revealed that closing off the tunnel opening had substantially increased CO concentrations in the tunnel, or caused any violation of any air quality standard where none now exists, the project sponsor and the Department of Public Works would discuss implementation of appropriate mitigation measures such as construction of a wall along the center line of the tunnel (to separate north and south tubes) from the project site to the eastern end of the tunnel beyond the City District Health Center No. 4, and/or placing a new fan at the eastern end of the northern tube (westbound) to assist in tunnel ventilation. The final determination on implementation (and payment for) this mitigation shall be made in consultation with the City Attorney and the Department of Public Works.

GEOLOGY/TOPOGRAPHY

MEASURES PROPOSED AS PART OF THE PROJECT

*- A detailed foundation and structural design study would be conducted for the building by a California-licensed structural engineer and a geotechnical consultant. The

project sponsor would follow the recommendations of these studies during the final design and construction of the project.

HAZARDS

MEASURES PROPOSED AS PART OF THE PROJECT

*- An evacuation and emergency response plan would be developed by the project sponsor or building management staff, in consultation with the Mayor's Office of Emergency Services, to ensure coordination between the City's emergency planning activities and the project's plan, and to provide for building occupants in the event of an emergency. The project's plan would be reviewed by the Office of Emergency Services and implemented by building management insofar as feasible before issuance of final building permits by the Department of Public Works.

- To expedite implementation of the City's emergency response plan, the project sponsor would prominently post information for building occupants concerning what to do in the event of a disaster.

-To ensure safe and adequate lighting of the tunnel, the tunnel ceiling under the project site shall be finished in the same material as the rest of the tunnel. The project sponsor shall provide lighting fixtures under the project site adequate to maintain safe and effective lighting of the tunnel.

UTILITIES/PUBLIC SERVICES

MEASURE PROPOSED AS PART OF THE PROJECT

- The project would include on-site storage for trash containers in the garage. Containers would not be placed on streets or sidewalks except during actual trash pickup.

CULTURAL RESOURCES

MEASURE PROPOSED AS PART OF THE PROJECT

*- Should evidence of cultural or historic artifacts of significance be found during project excavation, the Environmental Review Officer (ERO) and the President of the Landmark's Preservation Advisory Board would be notified immediately, and any excavation which could damage such artifacts halted. The project sponsor would select the archaeologist or other expert to help the Office of Environmental Review determine the significance of the find and whether feasible measures, including appropriate security measures, could be implemented to preserve or recover such artifacts. The ERO would then recommend specific mitigation measures, if necessary.

Copies of reports prepared according to this mitigation measure would be sent to the California Archaeological Site Survey Office at Sonoma State University. Excavation or construction that might damage the discovered cultural resources would be suspended for a maximum of four weeks (cumulatively for all instances that the ERO has required a delay in excavation or construction) to permit inspection, recommendation and retrieval, if appropriate.

VI. SIGNIFICANT ENVIRONMENTAL EFFECTS THAT CANNOT BE AVOIDED IF THE PROPOSED PROJECT IS IMPLEMENTED

This chapter identifies significant impacts that could not be eliminated or reduced to an insignificant level by mitigation measures included as part of the project, as described in Chapter V., Mitigation Measures, p. 68.

No project-specific or cumulative significant impacts have been identified. Mitigation measures included as part of the project are described in Chapter V., Mitigation Measures, p. 68.

VII. THE RELATIONSHIP BETWEEN LOCAL SHORT-TERM USES OF MAN'S ENVIRONMENT AND THE MAINTENANCE AND ENHANCEMENT OF LONG-TERM PRODUCTIVITY

The project would accommodate demand for residential space and senior community services space in the area. It would provide housing for 77 senior citizens.

VIII. SIGNIFICANT IRREVERSIBLE ENVIRONMENTAL CHANGES WHICH WOULD BE INVOLVED IN THE PROPOSED ACTION SHOULD IT BE IMPLEMENTED

The project would commit the project site to residential and community service uses probably for the lifetime of project (50 years). No project-specific significant impacts have been identified.

IX. ALTERNATIVES TO THE PROPOSED PROJECT

This chapter identifies alternatives to the proposed project, discusses environmental impacts associated with each alternative, and gives the sponsor's reasons for rejection in favor of the project. Regardless of the sponsor's reasons for rejection, the City Planning Commission could approve an alternative instead of the project if the Commission believed the alternative would be more appropriate for the site.

- Pineview Housing Corporation is a non-profit organization, formed in June 1983, for the purpose of sponsoring the development of low-income housing for elderly and handicapped residents. Pineview Housing Corporation initially proposed to develop the Pineview Elderly Housing Project as part of a Planned Unit Development (PUD) on 1055 Stockton St. (Orangeland) Mixed Use development (83.412E, EIR certified May 2, 1985). The Orangeland development would have consisted in part of 130 housing units, 70 of which would have been reserved for low income elderly occupants and a senior community facility. The rezoning and project was disapproved by the Board of Supervisors on August 5, 1985.

- Pineview Housing Corporation received commitment from the United States Department of Housing and Urban Development (HUD) for a Section 8/202 low interest mortgage for the proposed senior housing portion of the Planned Unit Development at the Trenton St. site. When that project was disapproved by the Board of Supervisors, the project sponsor and the City entered into protracted negotiations with HUD for an extension of time in order to locate another site for the proposed project. (Pineview Housing Corporation is currently seeking a second time extension from HUD.)

In addition to the alternatives discussed below, two other alternatives to the proposed project were considered by the project sponsor and the City. One alternative was development of 70 federally subsidized residential apartments for seniors and the physically handicapped persons, and a community center for senior citizens, over the land currently used as a parking lot for residents of the Ping Yuen housing project at 775 Broadway (Assessors Block 160, Lot 29). This alternative would not require a zoning re-classification of the site, and would have similar land use, urban design, transportation, operational air quality, energy and construction noise effects to those of the project.

However, potential shadow effects on apartment units on lower floors of the Ping Yuen building, resulting from siting a building of about 60 ft. in height adjacent to the Ping Yuen building, resulted in strong opposition to this alternative from residents of Ping Yuen and the Ping Yuen Tenants Association. Therefore, the project sponsor rejected this alternative.

- The site of the former International Hotel (Lots 11 and 13 of Assessor's Block 195) has been suggested as an alternative location for the 70 units of housing for seniors and the physically handicapped proposed by the Pineview Housing Corporation. On February 3, 1987, the developer of the Pan Magna Plaza project (84.533E), which includes the former I-Hotel site, agreed to revise his project and to develop 126 units of lower-income housing over retail and parking uses on that portion of the site. Those 126 housing units will receive construction subsidies directly from City sources (Office Affordable Housing Production Program (OAHPP) and Community Development Block Grant (CDBG) funds). That project does not have direct HUD funding. The former I-Hotel site would not be available to Pineview Housing Corporation.

In general, the criteria for site selection specified that a potential site must be located in a residential district, where residential development is a principal permitted use and community facilities are permitted as a conditional use.

A. ALTERNATIVE A: NO PROJECT

This alternative would entail no change to the site. The air-space over the Broadway Tunnel and the City-owned vacant lot would not be occupied with the project.

The environmental characteristics of this alternative would be as described in the Environmental Setting sections of this report (see Chapter III., pp. 21 to 36, for a discussion of existing conditions). Transportation, noise and air-quality effects described in Chapter IV pp. 49 to 65, associated with development of the project would not occur. Seventy-seven senior and handicapped citizens would not be housed on the project site. Land uses, views, and shadows would not change.

This alternative could result in the development at another location of federally subsidized residential apartments for seniors and the physically disabled, possibly in a building comparable to the project. Development on an alternative location within San Francisco's Chinatown or North Beach areas would result in many of the same impacts as described for the project; the effects of development would depend largely on the location chosen and cannot be determined accurately.

This alternative would preserve the option to develop a similar type of building or other alternative land uses on the site in the future.

This alternative has been rejected by the sponsors, because it would not enable them to construct federally subsidized rental housing for low-income senior citizens and physically handicapped persons, and a senior community center, on an unoccupied site on the edge of the Chinatown area.

B. ALTERNATIVE B: PUBLIC PARK

This alternative would develop a public park, instead of the proposed project, on air-rights over the Broadway Tunnel. The adjacent City-owned vacant lot would not be used under this alternative.

This alternative would be a public park of 10,640 gsf on air space over the Broadway Tunnel compared with about 30,900 gsf of residential space (70 units), about 4,700 gsf in a senior community center, about 3,485 gsf of open space, and about 3,400 gsf of parking space (12 spaces) for the project. The park would be a series of outdoor terraces, stepped back and up in height from the Mason St. (east) property line to the ventilation structure adjacent to the site's western properly line. The park would be developed as a neighborhood facility to serve the Russian Hill, Chinatown and North Beach area.

Environmental effects on transportation, and noise and air quality associated with construction, would occur with this alternative and would be similar to those of the project but of shorter duration (about five months, compared to 14 months with the project). Transportation effects associated with operation of a park could be less than the project, while effects on air-quality resulting from development of air-rights over the Broadway Tunnel would occur with this alternative as with the project. This alternative would not block any views and would not be visible beyond the immediate site vicinity. This alternative would result in no new shadow on streets and sidewalks in the area.

The project sponsors have rejected this alternative because it would not provide an opportunity for the development of rental housing for low-income senior citizens and physically handicapped persons, and a senior community center, on an unoccupied site in the Chinatown vicinity. The Recreation and Park Department considered the use of the project site as a location for a Chinatown park in their preliminary search for park sites. In 1983, the Cathay Mortuary site was selected as the Recreation and Parks Department's preferred location for a new park in Chinatown, following 14 years of investigation by the Recreation and Park Department. No funding has been allocated by the public sector for park development at the Broadway Tunnel site. Private sector funding has not been committed as of March 16, 1987. In the opinion of the project sponsor, the new park currently proposed by the City of San Francisco Recreation and Park Department at the Cathay Mortuary site, located on Powell St. between Jackson and Washington Sts., would meet the open space needs for the area.

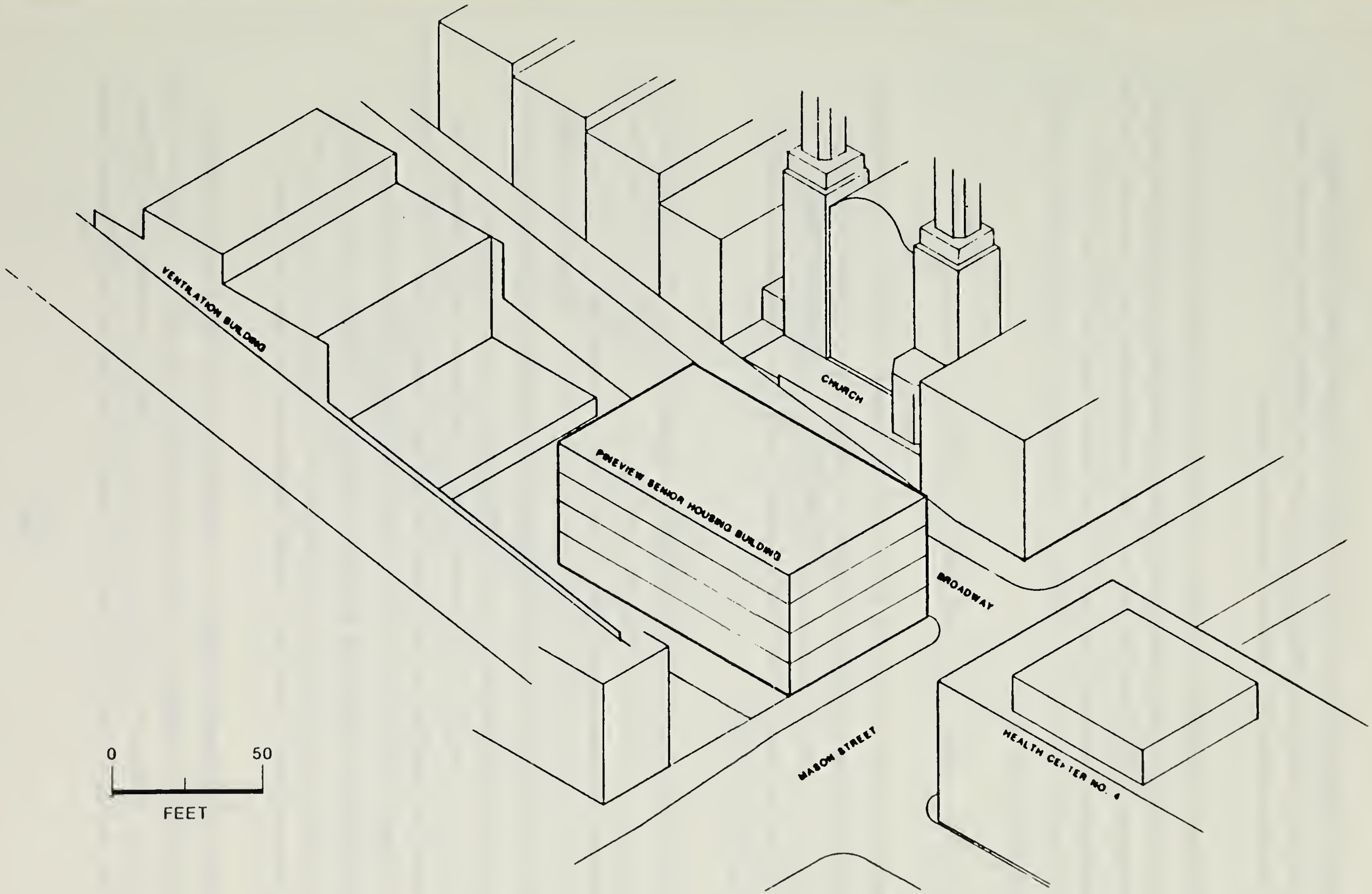
C. ALTERNATIVE C: REDUCED DENSITY

ALTERNATIVE C1: CODE CONFORMING REAR YARD

This alternative consists of a building which would not require a zoning re-classification, would not require CU authorization, and would not require any exceptions or variances from City Planning Code requirements, except for a variance to the required 25-ft. wide easement for windows under Section 140 of the Code.

This alternative would include about 13,600 gsf of residential space (35 units), compared to about 30,900 gsf (70 units) for the project (see Figure 17, p. 81). This alternative would also include about 1,700 gsf of senior lounge, office, support and circulation space compared to about 5,200 gsf for the project. Under this alternative, there would be no senior dining hall space as there would with the project. The building would be 40 ft.-tall (four stories) and would include seven parking spaces compared to 58 ft. tall, six stories with 12 spaces parking for the project. This alternative would not have any setbacks, as would the project. The ground-level public plaza and outdoor terraces proposed as open space with the project would not be included; this alternative would incorporate all required open space (3,724 gsf) in a private rear yard. This alternative would be built to property lines at Mason St. and Broadway.

This alternative would provide housing for 40 people, compared to 77 for the project. Transportation and energy effects would be about 50% less than the project. Construction noise effects would be less prolonged than with the project. Effects associated with changes in land use would be about 50% less than with the proposed project. Growth inducing impacts could be less than those of the project, as no zoning reclassification would occur. Air quality effects would be similar to those of the project due to development of air rights over the Broadway tunnel.



● FIGURE 17
ALTERNATIVE C1
REDUCED DENSITY (CODE CONFORMING REAR YARD)

This alternative would block views of Our Lady of Guadalupe Church, from a longer stretch of Mason St. than would the project because the building would not be set back at the Upper Broadway/Mason St. corner as would the project.

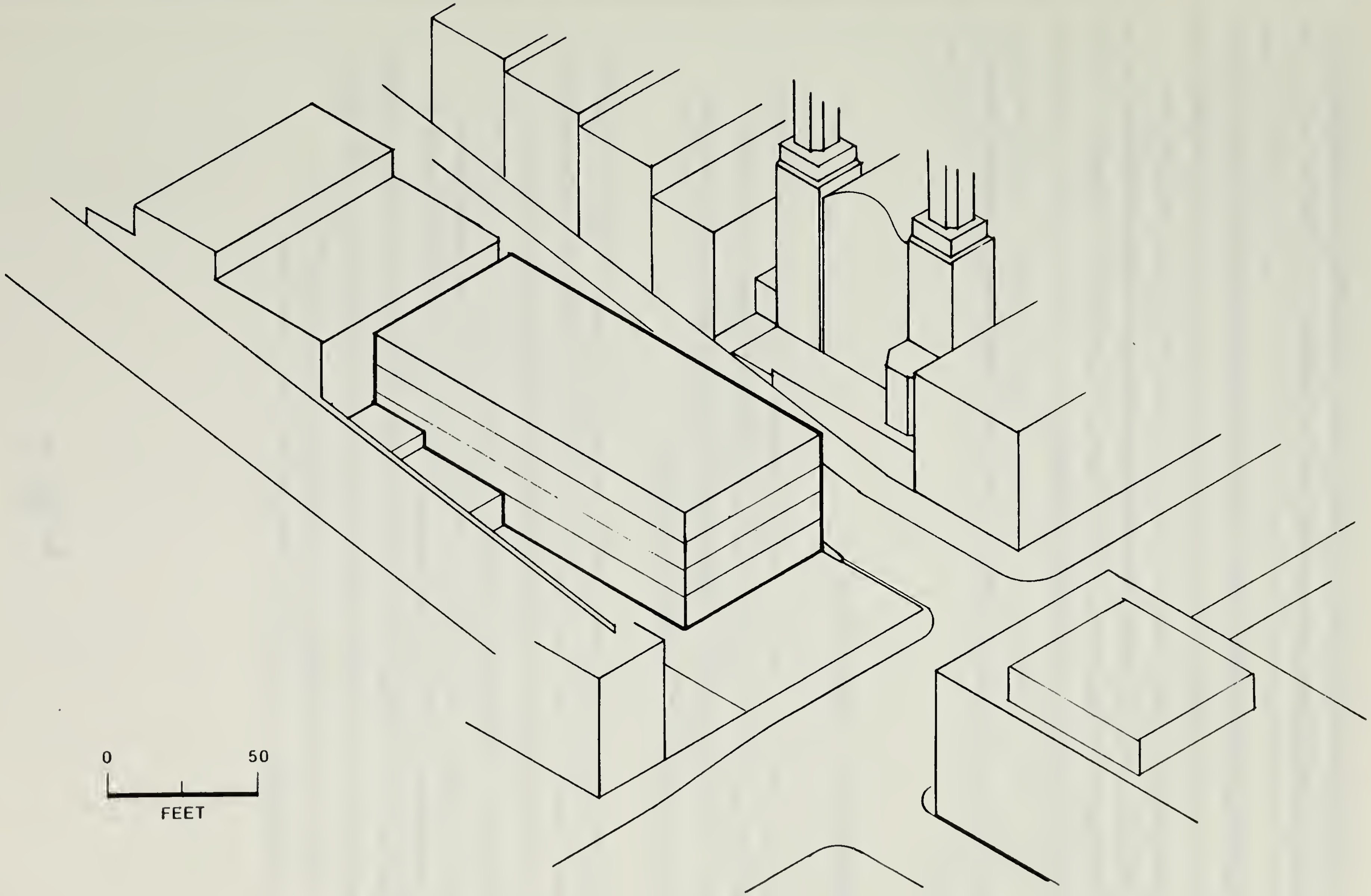
The sponsors have rejected this alternative because in their opinion it would result in an under use of the site for low-income senior housing. Additionally, available Housing and Urban Development (HUD) grant funding would be reduced under this alternative, thus the per-unit construction cost would be more. In the sponsor's opinion, the cost of the platform over the Tunnel would be so high as to make the per-unit "foundation" costs too high to justify only 35 units.

● ALTERNATIVE C2: REAR YARD VARIANCE REQUIRED

This alternative consists of a building which would not require a zoning re-classification, would not require CU authorization and would not require any exceptions from the City Planning Code, other than a variance to rear-yard setback requirements, under Section 134(a) of the Planning Code, and a variance to 25-ft.-wide window easement, under Section 140 of the Code.

This alternative would include about 13,600 gsf of residential space (35 units) compared to about 30,900 gsf (70 units) with the project (see Figure 18). This alternative would include the same amount of senior lounge, office, support and circulation space (1,700 gsf) as Alternative C1, compared to 5,200 gsf with the project. As with Alternative C1, there would be no senior dining hall space. This alternative's building would be 40 ft. tall (four stories) and would include seven off-street parking spaces as with Alternative C1, compared to the six-story (58-ft-tall) project with 12 off-street parking spaces. This alternative building would be set back from the Mason St. property line by about 56 ft.; all required open space (3,724 gsf) would be provided in a public plaza fronting the intersection of Mason St. and Upper Broadway, compared to a public plaza of 2,685 gsf and outdoor terraces containing a total of 800 gsf with the project. This alternative would require a variance to rear-yard setback requirements, as would the project.

This alternative would provide housing for 40 people, compared to 77 with the project. Effects associated with changes in land use, and transportation effects, would be less than with the project. Construction noise and vibration, and energy would be about 25% less than with the project. Growth-inducing effects would also be less than the project, as no



● FIGURE 18
ALTERNATIVE C2
REDUCED DENSITY (REAR YARD VARIANCE)

zoning re-classification would occur. Air quality effects resulting from development of air-rights over the Broadway Tunnel would be as for the project.

This alternative would block views of Our Lady of Guadalupe Church from a shorter length Mason St. (from sidewalks and cable cars) than would the project because of the shorter overall height of this alternative. Effects associated with urban design policies would be less because this alternative would be similar in scale and height to older residential buildings in the area. Shadow effects on the church and on streets and sidewalks would be less due to the buildings lower height.

The sponsors have rejected this alternative for the same reasons that Alternative C1 has been rejected.

D. ALTERNATIVE D: EXPANDED SITE

Under this alternative, the project site would be expanded to include Lot 1 of Assessor's Block 158 (5,773 gsf), which is currently used as a parking lot by patrons of Alfred's Restaurant. The city-owned, 10 ft.-wide easement (1,975 gsf) and air space over the Broadway Tunnel (10,640 gsf) would also be included.

● This alternative would include about 30,000 gsf of residential space (70 units) as would the project (see Figure 19). Under this alternative, the building would be six stories-tall; and would have 33 housing units on air space over the Broadway Tunnel, and would have 37 housing units on Lot 1, Block 158 compared to 70 housing units on air space over the tunnel with the project. This alternative would include 30 off-street parking spaces, including an additional 5,377 gsf of parking space (18 replacement parking spaces for Alfred's parking lot), in addition to the 12 spaces (3,400 gsf) for project residents. All but two of the parking spaces would be located in the portion of the alternative on air-space over the Tunnel. The two buildings of this alternative would be separated by a 25-feet-wide easement, and would be set back by five feet at each story.

As with the project, this alternative would also include about 4,700 gsf of space in a senior center (including lounge, dining hall, and kitchen space); about 500 gsf of office space (for visiting medical and social workers); and would include a 2,685 gsf open plaza fronting Mason St. as with the project, about 1,950 gsf of which would be exclusively for pedestrian use.

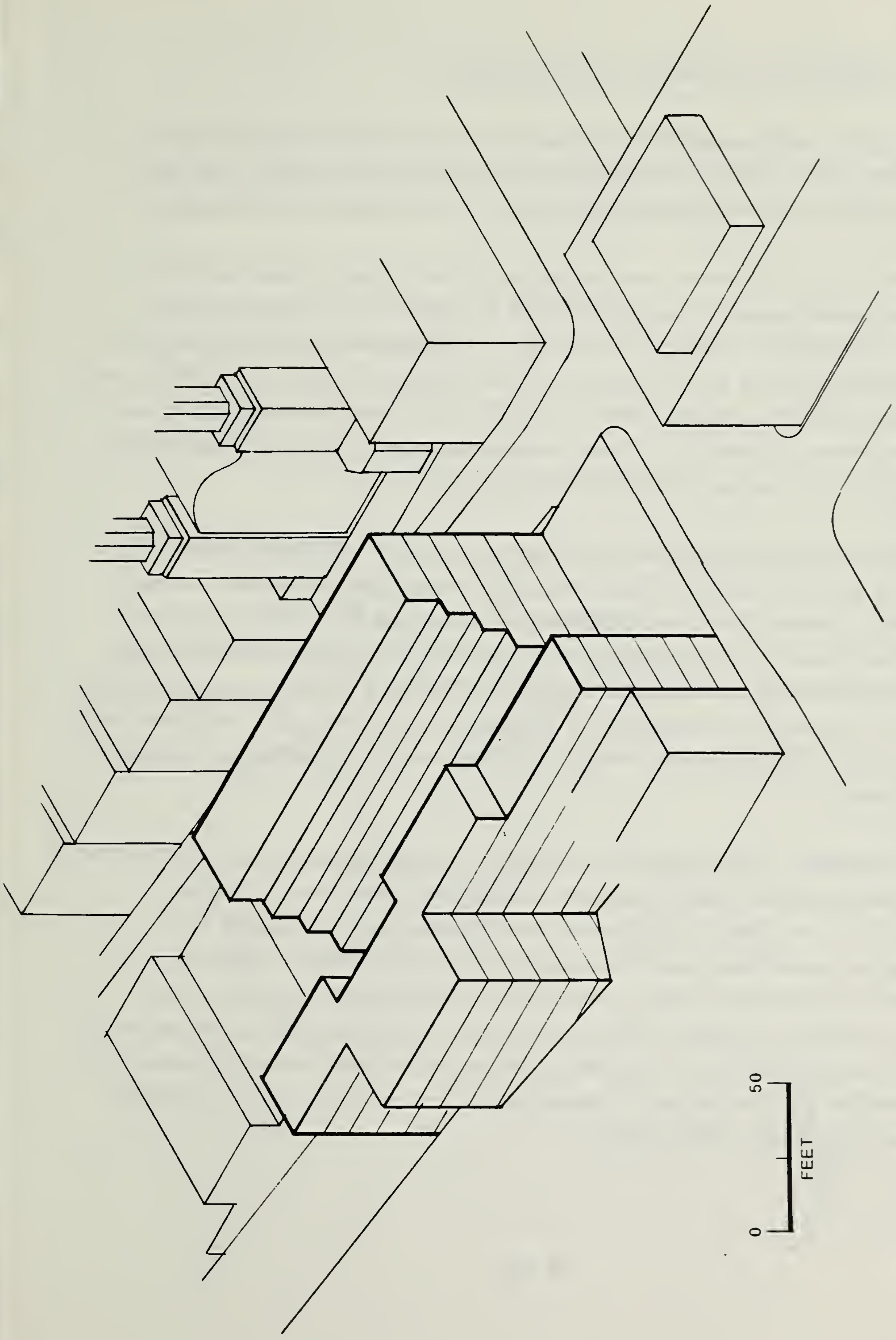
The buildings would each be 48 ft. tall (four stories) under this alternative, compared to the 58 ft.-tall project. Conditional Use authorization for exceeding 40 ft. in height, and for the senior community center, in an R-District would be required for this alternative, as with the project. A zoning re-classification to RM-3 (as opposed to RM-4 with the project) would be required for Lot 1, Lot 42 and air-space over the tunnel for this alternative.

Conditional Use authorization would also be required under this alternative, for operation of parking for Alfred's Restaurant. As with the project, this alternative would require a variance for not providing the required rear yard set back. This alternative would block views of the Our Lady of Guadalupe Church from a longer stretch of Mason St. than would the project, because the building on Lot 1 would not be a set back from Mason St., and the building on air-rights over the Tunnel would not be set back at upper levels from the Mason St. and Upper Broadway corner under this alternative. This alternative would appear bulkier than the project.

This alternative would provide housing for 77 people, as would the project. Transportation and air-quality effects would be the same as for the project. Construction noise effects could continue for a longer period of time than with the project, because this alternative would entail construction activities over a greater area than the project. Growth inducing impacts would be similar to those of the project.

In the event that parking for Alfred's would not be incorporated into this alternative, a Conditional Use authorization would not be required for inclusion of Alfred's parking. However, parking operations currently conducted on Lot 1 would have to relocate to make way for construction on this portion of the site. Given the lack of existing, vacant space in the vicinity of the site which could accommodate off-street parking, it is likely that parking would occur on-street, thereby increasing the demand for existing on-street parking spaces in the site vicinity.

The sponsor has rejected this alternative because it would require acquisition of Lot 1, and would thereby require additional funding which is not available at this time, and would also require the project sponsor to negotiate for acquisition of Lot 1. The additional cost for acquisition of Lot 1 would increase the per-unit construction cost of the project, and would therefore be a less efficient use of Federal and City funding.



● FIGURE 19
ALTERNATIVE D
EXPANDED SITE

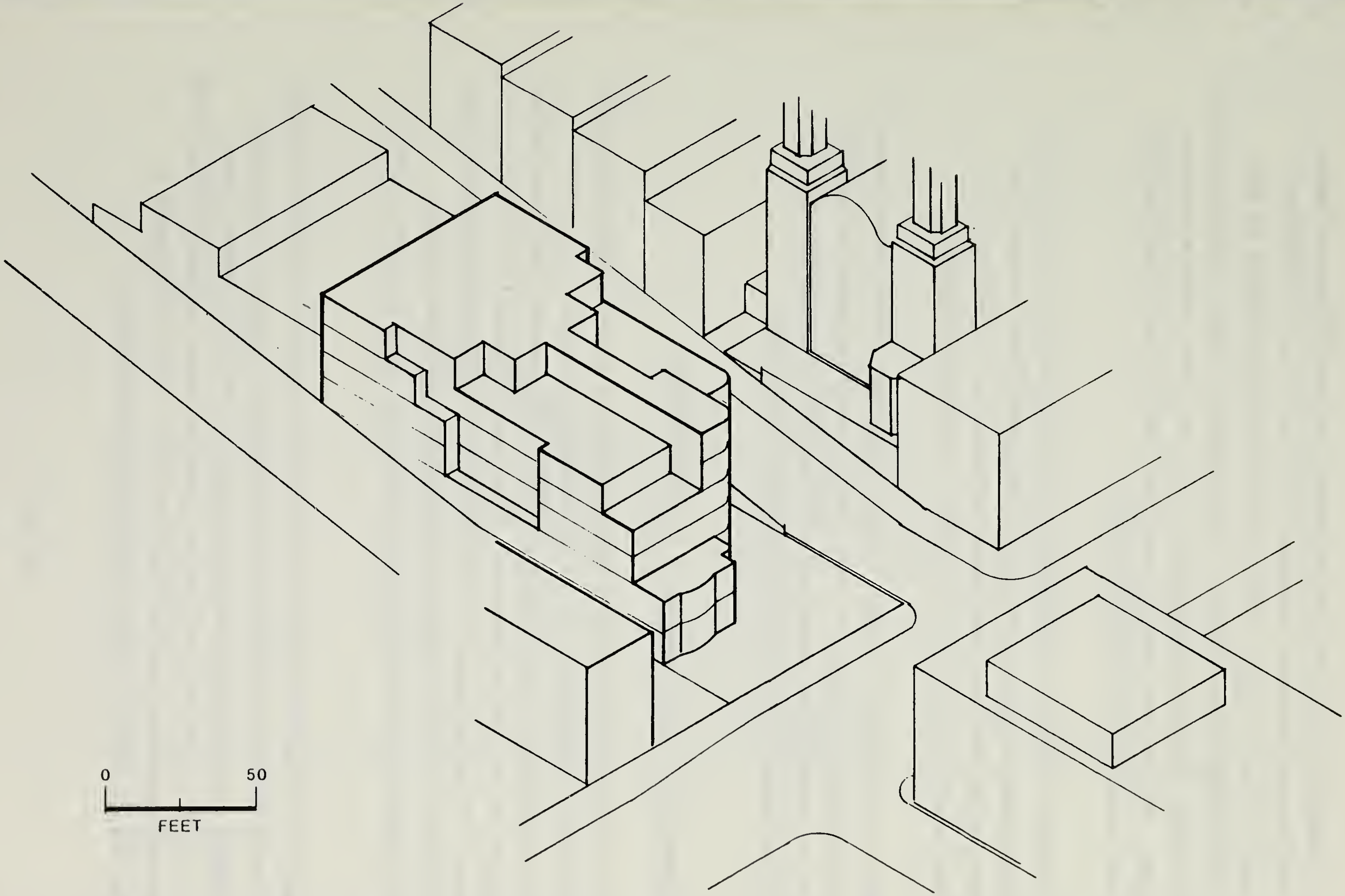
E. ALTERNATIVE E: NO SENIOR DINING CENTER

This alternative would contain about 600 gsf of space in a senior lounge compared to about 4,700 gsf in a senior center (including lounge, dining/multi-purpose room, and warming kitchen) with the project (see Figure 20). This alternative would include

about 500 gsf of office space as with the project. This alternative would include 14 off-street parking spaces, as would Alternative F, compared to 12 spaces with the project. The amount of residential space under this alternative (about 30,900 gsf in 70 units) would be the same as with the project. This alternative would be about 58-ft. tall on six floors as with the project; however, the sixth floor would be a partial floor, set back by an average of about 50 ft. from the project facade on Mason St. Other design features of this alternatives would be as for the project.

This project would be the same height and approximately the same scale, and therefore would have the same visability in short-range viewpoints as the project and the same relationship to Master Plan Urban Design Policies. The sixth floor would be set back further from Mason St. than with the project; therefore, the alternative building would block views of Our Lady of Guadalupe Church from Mason St. and cable cars travelling on Mason St. to a lesser extent, though from the same stretch of Mason St., than would the project building. This alternative would have approximately the same shadowing effects as the project.

As with the project, this alternative would require a zoning reclassification from RM-2 to RM-4; Conditional Use authorization under Section 303 of the Planning Code for exceeding 40 ft. in height in an R-District; and variances under Section 305 for not providing the required rear-yard setback; and under Section 140 of the Code for apartment windows facing a public right-of-way of less than 25 ft. in width. This alternative would not require Conditional Use Authorization under Section 209.4(a) for a senior community center in an R-District while the project would; as with Alternative F, this alternative would not require a variance under Section 151 for off-street parking spaces, which the project would require.



• FIGURE 20
ALTERNATIVE E
NO SENIOR DINING CENTER

Effects on transportation under this alternative would be about 55% less and loading effects would be almost eliminated, compared to the project, due to elimination of delivery trips to the senior center. This alternative would generate about the same number of trips during the p.m. peak hour, as the number of residents would be the same as with the project. Effects on parking would be less, since there would be two more spaces on-site. However, most parking demand would still be from residents and their visitors under this alternative as with the project.

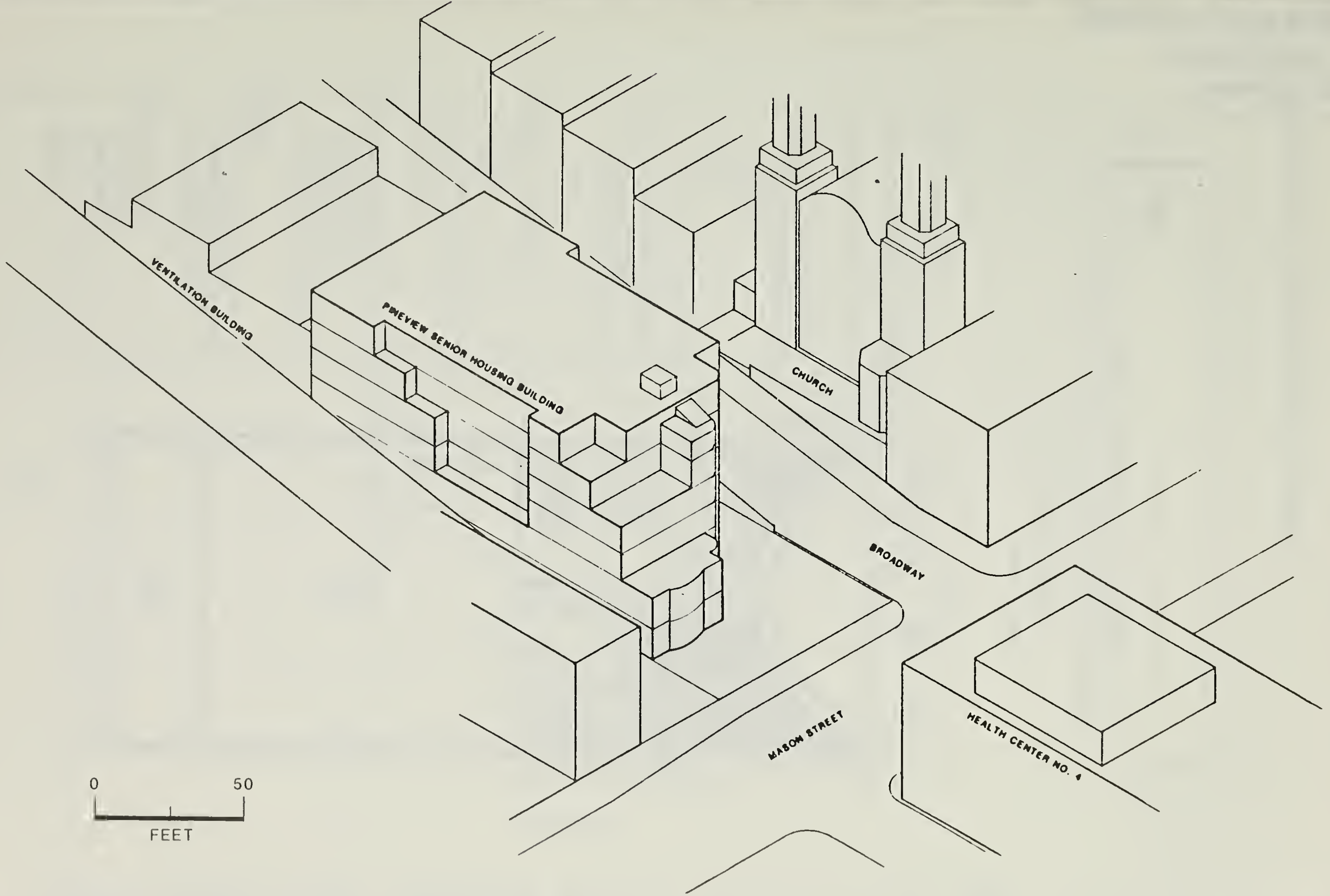
Construction noise and construction vibration effects would be about the same, but of slightly shorter duration, than with the project. Air quality effects resulting from development over the Broadway Tunnel would be the same as the proposed project. Growth-inducing effects would also be the same as the proposed project.

The sponsor has rejected this alternative because it would not provide a senior center. In the opinion of the project sponsor, the senior dining center would provide an essential service for the residents of the project and other low-income senior citizens and physically handicapped persons in the Chinatown-North Beach area.

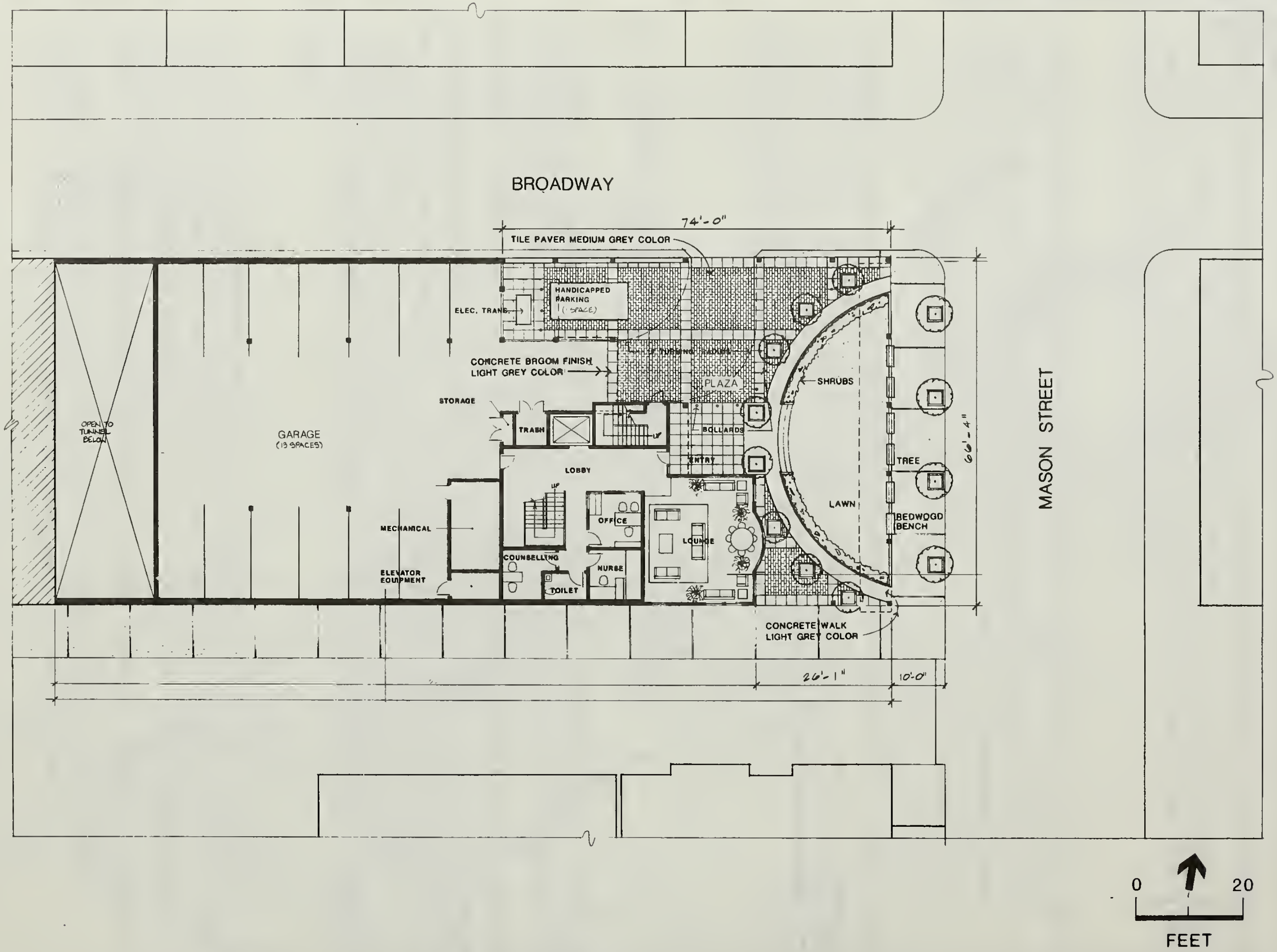
F. ALTERNATIVE F: CODE-REQUIRED PARKING ON-SITE

This alternative would have 14 off-street parking spaces, as required under Section 151 of the Planning Code, compared to 12 off-street spaces with the project. Under this alternative, the ground-floor would contain 13 fully-enclosed parking spaces; one parking space designed and reserved for handicapped drivers would be located outside, adjacent to the entrance to the parking garage. The ground-floor enclosed parking garage would also contain mechanical, storage and garbage container space. Other uses, building dimensions, design elements and floor areas would be as for the project (see Figures 21 and 22).

All impacts of this alternative would be as for the project (land use, urban design, traffic, transit, construction noise and vibration, air quality, shadows, and growth inducement); parking impacts could be slightly less, with two additional off-street parking spaces provided. This alternative would not require a parking variance, as would the project. All other approval requirements would be as with the project. The project sponsor is considering this alternative; it is their preferred development program.



● FIGURE 21
ALTERNATIVE F
CODE-REQUIRED PARKING ON-SITE



● FIGURE 22
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● X. SUMMARY OF COMMENTS AND RESPONSES

PINEVIEW SENIOR HOUSING
SUMMARY OF COMMENTS AND RESPONSES
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A. INTRODUCTION

This document contains summaries of the public comments received on the Draft Environmental Impact Report (DEIR), prepared for the proposed Pineview Senior Housing project, and responses to those comments. Also included are staff-initiated text changes and errata.

All substantive comments made at the Draft EIR public hearing before the City Planning Commission, December 11, 1986, and all written comments received during the Draft EIR public review period from November 7, 1986, through December 11, 1986, are presented herein by direct quotation, edited to delete repetition and nonsubstantive material only.

Comments and responses are grouped by subject matter and are arranged by topics corresponding to the Table of Contents in the DEIR. Each group of comments is followed by its set of responses; the order of the responses under each topic follows the order of the comments. As the subject matter of one topic may overlap that of other topics, the reader must occasionally refer to more than one group of Comments and Responses to review all information on a given subject. Where this occurs, cross references are provided.

Some comments do not pertain to physical environmental issues, but responses are included to provide additional information for use by decision-makers.

These comments and responses will be incorporated into the Final EIR as a new chapter. Text changes resulting from comments and responses will also be incorporated into the Final EIR, as indicated in the responses.

B. LIST OF PERSONS COMMENTING

A. Persons Commenting on Draft EIR at the Public Hearing on December 11, 1986

Rose Chin, Broadway Tunnel Park Committee
Christopher Grubb, Neighbor
Steve Kendrick, Neighbor
Cynthia Joe, President, Malayun Housing Project
Ann Ludwig, President, Russian Hill Neighbors
Melinda Pon, Representative, Our Lady of Guadalupe Church Parish
Al Petrie, Alfred's Restaurant
Calvin Li, Neighbor
Albert Pierce
Teresa Yap
Benson Lau, Neighbor
Father Donald McDonnell, Pastor, Our Lady of Guadalupe Church
Sarah McNichol
Clementina Garcia
Dennis Hearn, Neighbor
Eugene Brusatori
Neilsen Rogers (speaking for Joanne Nichols)
Walter Limbach, Neighbor
Peter Geraghty, Neighbor
Joe Lem, Neighbor
Terry Ow-Wing, Co-Chair, Committee for Better Parks and Recreation in Chinatown
Jennie Lew, Urban Planner/Activist
Vesta Kirby, Neighbor

B. Person's Commenting on Draft EIR In Writing

Alice Suet Yee Barkley, Project Attorney (December 4, 1986).
Eugene Brusatori (December 8, 1986).
Gina M. Brusatori (December 5, 1986).
Richard C. Brusatori (December 4, 1986).
Joan Sealy Burrows (December 10, 1986).
Rose Chin, Broadway Tunnel Park Committee (December 11, 1986).
Milton Feldsten, Air Pollution Control Officer, Bay Area Air Quality Management District (December 11, 1986).
Ann Ludwig, President, Russian Hill Neighbors (December 8, 1986).
Landmarks Preservation Advisory Board (December 11, 1986).
Father Donald McDonnell, Pastor, Our Lady of Guadalupe Church (December 11, 1986).
Debra S. Nicholson (December 11, 1986).
Melinda Pon (December 11, 1986).
Albert Pierce (December 11, 1986).
Neilsen and Carol Ann Rogers, neighbors (December 10, 1986).

Mark Ryser, Executive Director, Foundation for San Francisco's Architectural Heritage (December 11, 1986).
Mr. and Mrs. Albert E. Schlesinger, Neighbors (December 11, 1986).
K.L. (Dan) Wong, MUNI (November 12, 1986).

C. Persons Commenting on Non-Environmental Issues of the Project Only

Comments Received at the Public Hearing on December 11, 1986

Alice Barkley, Attorney for Project Sponsor
Moira Jackson, Catholic Committee for the Aging of the Archdiocese of San Francisco
Mary Louise Ansak, Executive Director, On Lok Senior Health Services
Nan McGuire, North Beach Neighbors
Florita Chacon
Jennie Lew, Urban Planner/Activist
Maria Michael

Comments Received in Writing

Christopher Grubbs
Mr. and Mrs. L. Greco
Henry Der, Executive Director, Chinese for Affirmative Action
Eileen Le Blond
Human Rights Commission
Daisy Lem
Terry Ow-Wing, Co-Chair Committee for Better Parks & Recreations in Chinatown
Elsie Ruiz

C. COMMENTS AND RESPONSES

PROJECT DESCRIPTION

Comment

"Basic description of project is inaccurate. The basic description of the project that is the subject of this EIR is seriously inadequate. This is not the typical situation where a private party has purchased a piece of property and is proposing to build a six-story housing project. Instead, the issue here is the proposed irrevocable transfer of public property to a private organization for private use. As the result of eminent domain proceedings when the Tunnel was built, in this instance the property owner of the open area over the Broadway Tunnel and the adjacent sewer easement, Lot 42, is the City and County of San Francisco, not Pineview Housing Corporation. . . . the failure properly to describe the project at the outset has resulted in a draft EIR that repeatedly fails to address numerous fundamental issues at stake.

"The draft EIR misleadingly describes the principal site under analysis as "air rights" over the Broadway Tunnel. Although the site in question is open to the Broadway Tunnel to constitute air rights, once the opening is covered with a slab, there is little question that the site is located squarely in the middle of a public street, Upper Broadway, as can clearly be seen in Figure 7 on p. 22 of the draft EIR. Consequently, what we are dealing with here, from a neighborhood and zoning standpoint, is a largely unprecedented proposal to construct a privately owned 6-story, 70-unit building in the middle of a public right of way. There is little difference between locating this project at this site than, say, locating it on Upper Stockton Street above the Stockton Street Tunnel.

"Nowhere does the draft EIR acknowledge the fact that the project involves construction in the middle of a public street." (Rose Chin, BTPC)

Response

As stated clearly in the EIR on p. 9, "Project Location," the site consists of air rights over a public right of way, and Lot 42, a City-owned utility easement. The site is owned by the City and County of San Francisco. As stated on p. 13 of the EIR, the City would lease the site to Pineview Housing Corporation for a nominal sum. The air-rights and Lot 42 would remain in public ownership. The lease would not be an, "irrevocable transfer of public property to a private organization," because the lease would include conditions to ensure that the site be developed and operated as low-income housing for seniors and the physically handicapped.

Development of the project would be sponsored by Pineview Housing Corporation, and would receive funding from and be subject to approval by the United States Department of Housing and Urban Development (HUD). The project would also receive funding from the City's OAHPP program and the State of California Senior Bond Act (see last paragraph on p. 13 and second paragraph on p. 19 of the EIR). Additionally, as stated in the last paragraph on p. 13, a monthly subsidy from HUD for a portion of tenant's rents would be provided. Therefore, the project would not be for "private use," in the sense that the development of low-income housing for senior citizens and the physically-handicapped serves a public objective.

The EIR acknowledges that the project would be constructed in the Broadway Tunnel right-of-way, as shown in Figure 7, p. 22. The eastern Tunnel ventilation building and the City Health Center No. 4 are also constructed in that same right-of-way. The commenter is not specific as to which "fundamental issues" were not addressed by the EIR. However, issues which are related to the project's location within a public right-of-way that have been analyzed by the environmental review process are: air quality within and around the Tunnel, shadows, views, construction vibration, construction effects on Tunnel traffic, Master Plan policies, urban design and alternative uses for the site.

Comment

"We . . . believe that the draft EIR incorrectly aggregates the area of the site for the purpose of calculating allowable density. Although the project sponsor is seeking air rights over the adjacent City-owned sewer easement (Lot 42), for the purpose of putting windows along the property line, it may be inappropriate to include the 1975 gsf. of the easement with the 10,640 gsf. open area over the Tunnel for a combined area of 12,615 gsf. used for the purpose of calculating allowable density. Since the easement strip is currently a public sewer easement and serves as a private right-of-way for parking access to the adjoining Lot 1 (used for parking by Alfred's Restaurant), a rule such as Sec. 207.1(d) of the Planning Code should apply for calculating density of dwelling units in R districts:

> (d) No private right-of-way used as the principal vehicular access to two or more lots shall be counted as part of the lot area for the purposes of calculating the permitted dwelling unit density.

"The draft EIR indicates that the city-owned Lot 42 now has been annexed to the Broadway Tunnel open area for the purpose of obtaining window variances and calculating allowable density. The adjacent property owners and interested parties have received no formal separate notice that the project description has been amended to include such property." (Rose Chin, BTPC)

Response

Section 207.1(d) of the Planning Code, quoted by the commenter, does not apply to the Pineview site. Lot 42 is a city-owned lot, held for the purpose of providing an easement for an existing 12-inch sewer main. In addition, although Lot 42 currently provides vehicular access to the parking lot for Alfred's Restaurant, the lot does not provide "principal vehicular access to two or more lots" and would not provide vehicular access to the projects' parking garage, which would be accessible from Upper Broadway. It therefore cannot be considered a private right-of-way.

Adjacent property owners and interested parties received notification of the inclusion of Lot 42 in the project site with the publication of the Initial Study, which was published on August 5, 1986, and with publication, distribution and advertising of the Draft EIR on November 7, 1986. These notices and publications meet the requirements of the City's official Environmental Review procedures which are specified in Article 31 of the San Francisco Administrative Code.

PROJECT CHARACTERISTICS

Comment

"Additional documentation we feel should be required for the Final EIR: North-South cross-sectional drawing through the proposed project and the Guadalupe Church showing the relationship of the project to the Church steps." (Ann Ludwig, RHN)

Response

Figure 3a, see p. 93 of this document, illustrates a cross-section of the proposed project in relation to the Church, from an eastward-looking perspective. Figure 3a is added to the EIR to follow p. 15.

Comment

"(Page 1, 3rd par.) The summary project description misstates the number of enclosed parking spaces contained in the ground floor. It should read 10 parking spaces as 2 of the 12 spaces provided are along Broadway (see p. 11)." (Ann Ludwig, RHN)

Response

As the commenter notes and as stated on p. 1 of the EIR in the following sentence of the referenced paragraph, ten of these spaces would be enclosed and two would be located outside the building, on the project site, by the garage entrance.

The ground floor plan for the sponsor's preferred alternative (Alternative F) includes a total of 14 off-street parking spaces, 13 of which would be enclosed, as required by the Code for the project (see Figure 22 on p. 238 of this document).

The first part of the third sentence of the third paragraph on p.1 of the EIR is revised to read (new language is underlined):

> The ground-floor of the building would contain lobby and lounge areas, an office for visiting medical and social workers, and 10 parking spaces;

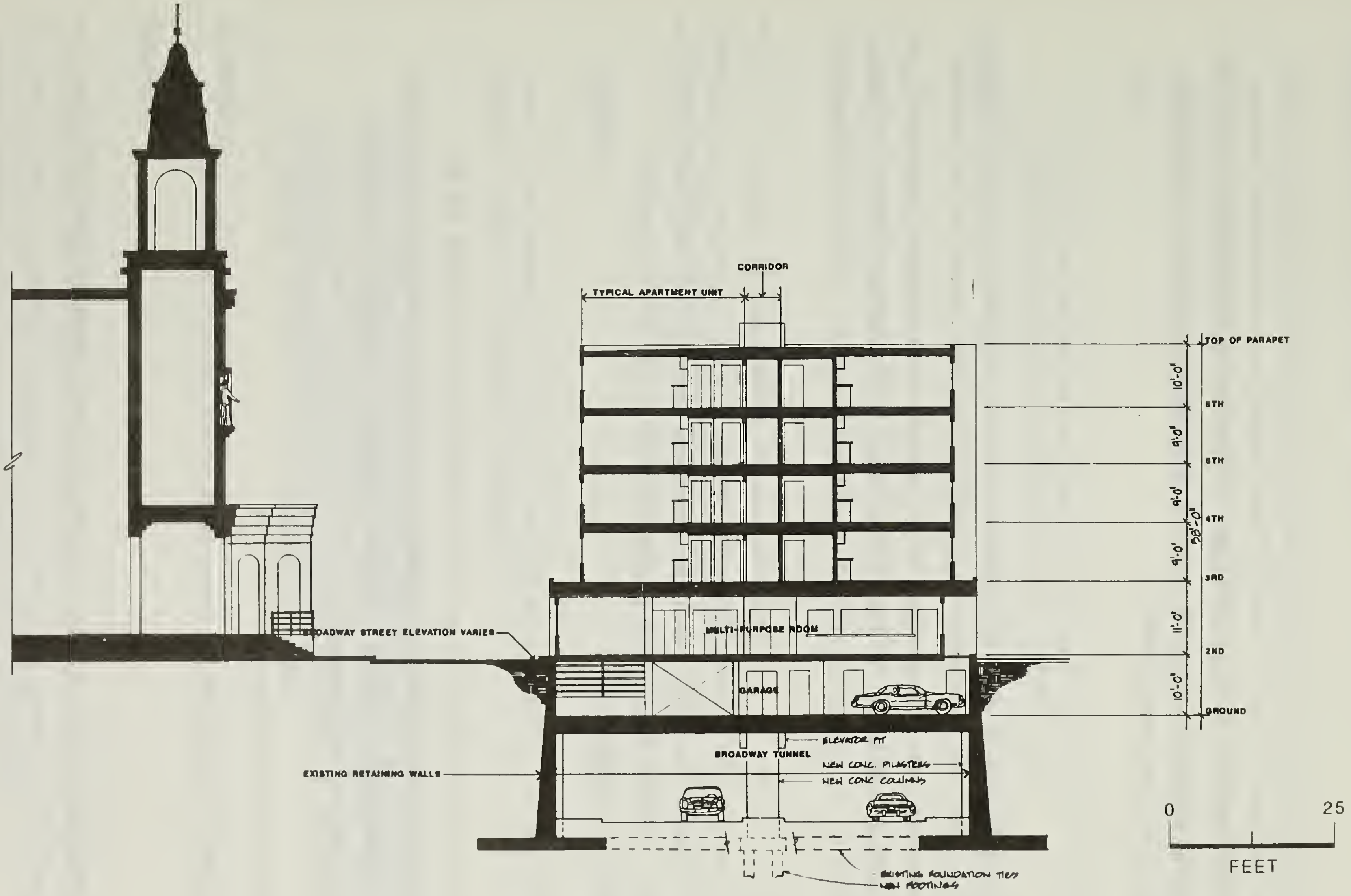


FIGURE 3a
BUILDING SECTION OF PINEVIEW
AND OUR LADY OF GUADALUPE CHURCH (LOOKING EAST)

Comment

"No provision is indicated for garbage collection, storage space, or mechanical rooms, all of which would logically occur in parking area and could easily encroach on the already inadequate parking." (Ann Ludwig, RHN)

Response

The project would include space for garbage collection, mechanical equipment and storage on the ground floor; the exact location had not been decided at the time the Draft EIR went to print. Figure 22, p. 153 of this document shows the location of space for garbage collection, mechanical equipment and storage on the ground floor of Alternative F, the sponsors preferred alternative (see also p. 235 of this document)

Comment

"In a building for disabled and senior citizens, why is this housing project designed with only one elevator? Will there be a back up diesel generator for the elevator and emergency lighting?" (Melinda Pon)

Response

The California Administrative Code Title 24 (handicapped code), and the San Francisco Building Code require one elevator for a project of this size. The project would not have a diesel generator. Emergency power for elevator operation and lighting would use battery power./1/

NOTE – Project Characteristics

/1/ Robert Yee, Pineview Housing Corporation, letter, January 22, 1987.

Comment

"Page 45. Who has responsibility for the maintenance of the proposed plaza?" (Melinda Pon)

Response

The commenter is referring to the third paragraph on p. 45, Table 2, which discusses the relationship between the project and Objective 1, Policy 6, regarding street features (such as the proposed plaza on Mason Street). The following is added as the last sentence of the second full paragraph on p. 11 (Project Characteristics) of the EIR:

> The building management of Pineview Housing Corporation, the project sponsor, would be responsible for maintenance of the outdoor plaza.

Comment

"Page 77, 2nd paragraph, line 2: Please add 'and handicapped' after the words 'elderly residents' and delete the rest of the sentence. Under HUD guidelines, Pineview cannot discriminate.

"Page 77, 2nd paragraph, lines 3 & 4: Please add after the word develop, 'the Pineview Elderly Housing Project as part of a planned unit development (PUD) on' and delete the words 'the housing portion of the'." (Alice Barkley)

Response

The first and second sentences of the second paragraph on p. 77 of the EIR are revised to read (new language is underlined):

> Pineview Housing Corporation is a non-profit organization, formed in June 1983, for the purpose of sponsoring the development of low-income housing for elderly and handicapped residents. Pineview Housing Corporation initially proposed to develop the Pineview Elderly Housing Project as part of a planned unit development (PUD) on 1055 Stockton St. (Orangeland) Mixed Use development (83.412E, EIR certified May 2, 1985).

SCHEDULE

Comment

"The report is overly optimistic in its estimation of the time that it will take to complete the construction. The work listed totals 9.5 months as compared to the 14 months that the report indicates as the construction period." (Ann Ludwig, RHN)

Response

The construction schedule for the project on p. 13 of the EIR is revised as follows (changes are underlined):

Site Preparation	12 weeks
Building Platform	12 weeks
Steel Erection	8 weeks
Exterior Finishing	12 weeks
Interior Finishing	16 weeks

The duration of the site preparation phase in Table 3, Typical Commercial/Industrial Construction Noise Levels, on p. 54 of the EIR is changed from "6" weeks to "12" weeks.

The first part of the sixth sentence of the second paragraph on p. 55 of the EIR is revised to read (new language is underlined): "During the noisiest 16 weeks of construction (see Table 3), . . . "

The references in the EIR to the length of time during the construction period when one traffic lane and one pedestrian walkway of the Broadway Tunnel would be closed are revised from 'approximately 20 weekdays' to 'approximately 24 weekdays'; at the end of the first sentence of the last full paragraph on p. 3; and the second sentence of the second full paragraph on p. 49. The total estimated construction time period would still be about 14 months as stated on p. 13 of the EIR. Some of the construction phases would overlap.

COST

Comment

"COST, p. 13: $225,000 for the construction of the Senior Center should read $250,000." (Alice Barkley)

Response

The cost of construction of the senior center, as shown on line 7 of the last paragraph on p. 13 of the EIR is revised to $250,000.

Comment

"It seems to be a $5.1 million dollar project, which translates out to about $66,000 per occupant, which seems to be pretty nice. On the other hand, I have heard it's $28 million dollars. I don't know if the EIR has addressed that." (Al Petrie)

Response

Project costs are discussed on p. 13 of the EIR. The first and second sentences of the last paragraph on that page give actual construction and replacement costs of the project "Estimated construction cost of the project would be about $4.6 million (1986 dollars), including site preparation, building shell and interior improvements. Replacement cost for the entire building, including architectural and engineering fees, would be about $5.1 million."

As the commenter notes, with 70 housing units proposed, construction cost would be about $66,000 per unit, averaged.

The reference to $28 million is unclear. As stated on p. 13 in the last paragraph, the project would receive a low interest mortgage of $3.6 million from the United States Department of Housing and Urban Development, $750,000 from the San Francisco OAHPP, and $225,000 (corrected to read $250,000, see response above) from the States' Senior Center Bond Act for the project. Additionally, a monthly subsidy from HUD would be provided to meet the difference between subsidized tenant rents and fair market value for the rental units.

FEES

Comment

"Necessary fees have not been paid. It recently has come to our attention that a special amendment to Section 351 of the Planning Code and to Section 31.46 of the Administrative Code (File 115-86-27) has been introduced to exempt organizations sponsoring housing projects from paying the fees required for preparing an EIR. The fact that this legislation has arisen in conjunction with the Pineview EIR raises the issue of whether Pineview has paid the necessary EIR fees. Given the estimated construction cost of $4.6 million, Pineview should have paid the Department of City Planning $43,200 prior to the commencement of the EIR's preparation.

"To our knowledge, this fee has not been paid, presumably in the hopes that the legislation will be enacted. This raises the serious question of what right a private party has to tie up the time of the taxpayer-supported City Planning environmental review staff members in an EIR process without paying in advance the requisite fees, and without taxpayers having had the chance to weigh the merits of such a subsidy before the fact.

"Inspite of its integral relationship to the Pineview Housing Project, concerned neighbors have received no notice of the pending legislation waiving EIR fees for the sponsor, nor is it mentioned in the body of the draft EIR." (Rose Chin, BTPC)

Response

Article 31 of the San Francisco Administrative code does not specify a particular point in the environmental review process when fees are due and payable. However, it is customary for the Department to collect the Initial Study fee at the time the environmental review application is filed, and to collect the EIR fee when the first preliminary draft EIR is submitted for staff review. It is not uncommon for the environmental review process to commence without payment of fees when a project includes City funding or sponsorship. In this case, the sponsor applied for an exemption from all fees under Section 351(e) of the City Planning Code and Section 31.46(b) of Chapter 31 of the City Administrative Code. On June 25, 1986, the City Planning Department sent the sponsor a letter formally notifying them of the fees which were due for all applications related to the proposed project, and requesting payment of those fees. The letter also notified the sponsors of the Zoning Administrator's determination that the sponsors did not qualify for a fee exemption under the existing codes (as of the date of the letter). The fees for the proposed project for the applications on file (as of the June, 1986 date) total $32,075 and are as follows:

Initial Study	$ 3,775
Review of EIR	10,800 + 400 for Dept. of Public Works
Conditional Use	8,500
Variance	8,500
Reclassification	500

Since then, the legislation referred to by the commenter was adopted by the Board of Supervisors on February 9, 1987, and was signed by the Mayor on February 20, 1987 (Ordinance No. 41-87, amending Part II, Chapter II of the San Francisco Municipal Code Section 351 and amending the San Francisco Administrative Code Section 31.46). Due to this pending legislation the Department of City Planning did not require payment of the fees. Under this legislation, Pineview Housing Corporation will be exempt from the fees for environmental review and for other Department of City Planning application fees as described above. Discussion of fees for environmental review is not normally included in an EIR.

APPROVAL REQUIREMENTS

Comment

"Pineview has no authority to request an EIR. The fact that the City legally owns the property in question raises the threshold issue of what authority Pineview Housing Corporation, or its affiliate, Self-Help for the Elderly, has to be filing an application for an environmental review or conducting such a review for this site. On the application for Environmental Evaluation filed on December 23, 1986, the signature line for 'owner' or 'authorized agent of owner' contains the signature of Anni Chung, from Self-Help for the Elderly. (Exh. A [pp. 101 to 103 of this document].) No letter has been submitted indicating that Ms. Chung has been empowered by the City to act as agent for this property, nor is there any evidence that any formal process has been undertaken by the Board of Supervisors, the Department of Real Estate, the Department of Public Works or the Recreation and Park Department to grant her such authority.

"Given this serious defect in the environmental review process, it appears that this project is being improperly heard by the Planning Commission at this time. We recommend that the matter be referred to the City Attorney's office for review." (Rose Chin, BTPC)

Response

The Pineview Housing Corporation was established by the Self Help for the Elderly Board of Directors in April, 1983 for the sole purpose of developing a HUD Section 202 project. As the parent organization, Self Help for the Elderly would assume the financial and other support of Pineview Housing Corporation over the full 40-year term of the Section 202 loan. As stated on p. 13 of the EIR, Pineview Housing Corporation would lease the air rights over the Broadway Tunnel from the City for a nominal annual sum. The application for Environmental Evaluation referred to by the commenter (see pp. 101 to 103 of this document) was an application for an Initial Study for the proposed project. Ms. Chung signed as authorized representative for the developer, Pineview Housing Corporation. Subsequent to completing the Initial Study, the Department of City Planning Office of Environmental Review determined that an EIR was required. The project sponsor does not 'request' an EIR, but may apply for environmental review. Article 31 of the City's Administrative Code does not contain any restrictions on who can initiate a request for environmental review of a project subject to CEQA. Article 31 does not contain a requirement for authorization from the property's owner. The application forms currently used by the City Planning Department request that written authorization from the property owners be submitted as part of the application when the applicant for environmental review is not the owner. The purpose of this procedure is merely to ensure that the owners receive early notice of any proposals involving their property. In this particular case, the procedure was deemed unnecessary since Pineview representatives had met with all involved City Department heads and had obtained their informal consent to proceed with the environmental review process. While the materials and information specified on the application forms is meant to provide a complete and adequate submittal, the Department of City Planning, under Article 31, has the sole responsibility for making that determination. What constitutes a complete and adequate environmental review application may vary depending on the circumstances of each project.

Comment

"The approvals section [should] be amended to include those steps necessary to vacate a public right of way." (Rose Chin, BTPC)

Exhibit A

SELF-HELP FOR THE ELDERLY

Aiuto Da Se Stessi
Per Gli Anziani
安老自助處
Saraling Tulong
Sa Matatanda

An Agency of United
Way of the Bay Area

A Delegate Agency of
the Economic Opportunity
Council of San Francisco

640 Pine Street
San Francisco,
California 94108
Tel 982-9171

December 23, 1985

RECEIVED
DEC 23 1985
CITY & COUNTY OF S.F.
DEPT. OF CITY PLANNING

Mr. Dean Macris, Director
Department of City Planning
City and County of San Francisco
450 McAllister Street
San Francisco, CA 94102

RE: Pineview project

Dear Mr. Macris:

Please accept enclosed our Environmental Evaluation application and required exhibits for your department's initial study of the Pineview project sponsored by Self Help for the Elderly and Pineview Housing Corporation.

Please note we are not submitting, along with the application, a fee because we had earlier submitted a request to Mr. Robert Passmore for a fee waiver, permissable under the San Francisco Administrative code Section 31.46. Mr. Passmore informed us on December 23rd that since he is still evaluating our request, we can submit the application without the fee pending his decision.

We very much appreciate your department's generous assistance and cooperation to us so we can meet a very stringent schedule. Should you have any questions, please call Ms. Yvonne Lee at 982-9171.

Happy Holidays!

Sincerely,

Anni Chung

Anni Chung
Executive Director

cc: Mr. Chuck Forester

SAN FRANCISCO DEPARTMENT OF CITY PLANNING

ENVIRONMENTAL EVALUATION APPLICATION
(for Initial Study)

This form will not be processed until it is completely filled out. If you have questions, call 558-5261

FOR OFFICIAL USE ONLY

File No.: 85.693E

Date Received

RECEIVED
DEC 26 1985
CITY & COUNTY OF S.F.
DEPT. OF CITY PLANNING

Fee: amount:

paid: yes ___ ; no ___

I. APPLICATION INFORMATION

A. Name, address and zip code of developers or project sponsor: Self Help for the Elderly/
Pineview Housing Corporation
640 Pine Street, S.F. CA 94108

B. Name, address, zip code and day time telephone number of persons to be contacted conerning this project:
Yvonne Lee
640 Pine Street, S.F. CA 94108 982-9171

II. PROJECT DESCRIPTION
(WITH THIS FORM, SUBMIT PLANS & PHOTOGRAPHS LABELLED "FOR ENVIRONMENTAL REVIEW")

A. 1. Name and description of project: Pineview elderly housing project-a 70-unit elderly and handicapped housing development with U.S. Housing & Urban Development construction loan. A multi-purpose senior activities center will be located in the project for residents and community use.

2. Project involves: ☒ new construction; ☐ addition to building; ☐ remodeling; ☐ demolition; ☐ other;

B. Location
1. Address: Air rights above Broadway Tunnel west of Mason Street.
2. Between what streets?: Broadway & Pacific Ave.
3. Assessor's block number/s: adajacent to 158, lot/s: N/A

C. For each of the following possible city actions, indicate whether required, and filing date:

	Required Yes	Required No	If required, give date filed or proposed for filing in future. Date filed	Date proposed for filing
1. Conditional Use		X X		
2. Discretionary Review		X		
3. Rezoning		.		
4. Variance		X		
5. Special use		X		
6. Other		X		
7. Building Permit		X		Application No.

List and describe any OTHER related permits and other public approvals required for this project, including those required by other city, regional, state and federal agencies: The city-via the Board of Supervisors action-will approve air rights leasehold to Pineview Housing Corporation after the Department of City Planning grants the necessary environmenal clearances.

D. Using attachments if necessary 102 .cribe the type of project and the project's physical characteristics, including: ATTACHMENT A

$4.6 million

3. Type directly on mailing labels names and addresses of all owners property which touch the subject site or are situated directly acro a street or alley. These labels must accompany this form. Do n reference a separate application. For each owner, list the Assessor Block/Lot number and mailing address with full zip code. Please ty or write very legibly keeping all information well within the cent of each label.

EXAMPLE:

8501/22, 23 & 24
John D. Doe
1234 Alpha Street
Anytown, CA 94000

IV. CERTIFICATION

I hereby certify that the statements furnished above and in the attached exhibi present the data and information required for this initial evaluation to the be of my ability, and that the facts, statements and information presented are tr and correct to the best of my knowledge and belief.

If not signed by owner of site, submit letter indicating that signer is authorized agent of owner.

(signature)

12-23-85
(date)

For: Self Help for the Elderly

REMEMBER: (1) drawings of project (2) photographs and (3) list of property owne are to be attached to this form.

Submit this form (with all attachments clearly labelled) to the Zoning Informati Counter, Department of City Planning, 450 McAllister Street, 5th Floor, S Francisco.

ATTACHMENT A

Response

As discussed on p. 9 of the EIR (Project Description - Location), the project site includes air-rights over the Broadway Tunnel. The following replaces the third paragraph on p. 19 of the EIR, in the Approval Requirements section:

> The project would require a street space permit from the Department of Public Works in order to close a portion of Broadway during portions of the construction period. Development of the project on air rights over the Broadway Tunnel would require vacation of a portion of a public right-of-way, and subsequent leasing to Pineview Corporation. The required steps, following certification of the EIR by the City Planning Commission, would be: 1) the City Planning Commission would determine whether the action conforms to the City's Master Plan; 2) the recommendation on the action would be forwarded to the Department of Public Works, Surveys and Mapping Division; 3) following approval by the Department of Public Works, the action would be referred to the Department of Real Estate, which would subsequently prepare a resolution to vacate air-rights; 4) the recommendation and resolution on the action would be forwarded to the appropriate committee of the Board of Supervisors; 5) the Board of Supervisors committee would hold a hearing on the action and on the proposed rezoning; 6) two full Board of Supervisors readings on the proposal would be held; 7) the terms of the requested lease would be negotiated between the sponsor (Pineview Corporation), the Department of Real Estate and the Mayor's Office of Housing and Economic Development (MOHED). (HUD requires a lease term of at least 40 years.)

Comment

"I understand that the proposed building at this site has been tentatively approved by the San Francisco Planning Commission, pending an environmental impact report." (Eugene Brusatori)

Response

The City Planning Commission has not taken any action (tentative or final) on the proposed project. Action on project approval cannot be taken until environmental review is complete. After publication of this document, Summary of Comments and Responses, the City Planning Commission will consider certification of the EIR in a regularly scheduled public meeting. Once the Planning Commission finds the EIR to be adequate, accurate and complete, the Planning Commission, may approve, or approve with conditions, the project or one of its alternatives including the No-Project alternative. As described in the previous response, the Board of Supervisors would have to approve the vacation of the air-rights, the lease of air-rights and the rezoning of the site.

Comment

"Page 39. In order to build the proposed Pineview Senior Housing Project, the following authorizations would be required:

1. Rezone from RM-2 to RM-4.
2. Conditional use authorization for exceeding the 40 ft. height limit in an R-district.
3. Conditional Use authorization for a community facility (Senior Community Center) in an R-district.
4. Page 40. Conditional Use authorization for a special exception for exceeding the maximum bulk limits specified in City Planning Code Section 270-A.
5. Variance for not providing a rear-yard set back.
6. Variance for apartment windows to face a public right of way or rear yard of at least 25 feet in width.
7. Variance for not providing the require number of the street parking spaces."

"If variances and conditional use authorizations of this nature . . . were granted, what would be the quality of these senior apartments and would not these actions set a precedent for high density residential housing?

"On p. 39 of the EIR, it discusses what conditional use authorizations and variances will be necessary in order for this project to go through as proposed by the Pineview Association, or whatever that group is called.

"They need to rezone from RM-2 to RM-4. There is a 40-foot limit in our district. There is a Conditional Use authorization for community facility. There needs to be Conditional Use authorization for exceeding the maximum bulk limits; variance for not providing a rear yard set-back; variance for apartment windows to face a public right-of-way; rear yard at least 25 feet in width; and a variance for not providing the required number of street parking spaces.

"Our question posed to the Planning Commission is: If variances and Conditional Use authorizations of this nature were granted, what would be the quality of the senior apartments." (Melinda Pon)

Response

Approval requirements which the project would require are discussed on pp. 19 to 20, Approval Requirements, of the EIR. The second sentence of the second paragraph on p. 19 states, "The project would require Conditional Use authorization under Section 303 of the City Planning Code for exceeding 40 ft. in height in an R-District (Section 253), for the senior community center in an R-District, (Section 209.4(a)); and for exceeding bulk limits (Sections 270 and 271)." The project would not exceed bulk limits for the site; the EIR was in error (see Staff Initiated Text Changes on p. 242 of this document). In an 'A' Bulk District, bulk limits apply to the portion of a building which is over 40 ft. in height. Section 260(a) of the Planning Code stipulates that the method of measurement for height of a structure where the maximum allowable height limit is 65 ft. or less. A single point at curbside, midpoint along with width of the lot, is used to determine maximum building height on that lot, as specified in Section 260 (a(3)). Height, as defined in Section 102.11 of the Planning Code, is the vertical distance by which a building rises above a certain point of measurement. Section 102.11(c) of the Code specifies that for an upward sloping lot, height is measured in relation to ground elevation. The project site slopes upward toward the west from Mason St. For the project site, the length and diagonal dimensions for the portion of the project over 40 ft. in height would be about 85 ft. and about 109 ft., respectively, which is within the maximum dimensions of the A-Bulk district of 110 ft.and 125 ft.

As stated in the first sentence of the paragraph which begins as the last paragraph on p. 25 (zoning), "The project site is in a 65-A Height and Bulk district, with a maximum allowable height of 65 ft. . . ." Thus, the maximum allowable height for the site is 65 ft., with Conditional Use authorization required for any project which would exceed 40 ft. in height. The apartment units of the project would conform, as required, to standards of the United States Department of Housing and Urban Development (HUD), and the City of San Francisco Housing Code and Building Code.

The following text is added to the discussion of Approval Requirements, after the third paragraph on p. 19 of the EIR:

> On November 14, 1986 the voters of San Francisco passed Proposition M, the Accountable Planning Initiative. Proposition M established eight Priority Policies. These policies are: preservation and enhancement of neighborhood-serving retail uses; protection of neighborhood character; preservation and enhancement of affordable housing; discouragement of commuter automobiles; protection of industrial and service land uses from commercial office development and enhancement of resident employment and business ownership; earthquake preparedness; landmark and historic building preservation; and protection of open space. Prior to issuing a permit for any project which requires an Initial Study under CEQA or adopting any zoning ordinance or development agreement, the City is required to find that the proposed project or legislation is consistent with the Priority Policies. The City Planning Commission, in its decision regarding the proposed project approval or disapproval would make a determination of the project's conformance with the Priority Policies.

Many of the low-income elderly of San Francisco are living in residential hotels. In the Chinatown area, the elderly residing in residential hotels often share bath and kitchen facilities with others; in other residential hotels, there are no kitchen facilities. The residential hotels are typically older structures and the room sizes are often below present Building Code and Housing Code standards. The residential units in the proposed project would each have private kitchen and bath facilities; each unit would be about 350 sq ft. (except for the seven one-bedroom units which would each be about 450 sq. ft.). The sponsors, in marketing the proposed units, would encourage low-income residents of sub-standard housing to apply for these units.

It is unlikely that this project would set a precedent for high-density residential housing because of the unique circumstances of this project. See response on pp. 195 to 197 of this document under Growth Inducement.

LAND USE AND ZONING

Comment

"The worthiness of this cause, . . . should not be allowed to blind city officials and the public to the fact that the project proposed may be entirely inappropriate for the Broadway Tunnel site in question. The project originally was configured for a more densely zoned site (the Orangeland site), where 70 units and 6 stories were less incompatible with the surrounding neighborhood. Trying to wedge such a project into a 2-3 story neighborhood would require major departures from the height, density and parking requirements applicable to the site, as well as an unprecendented upzoning that flies in the face of numerous neighborhood and city-wide movements to downzone the area." (Rose Chin)

"The Pineview Project was designed for another site, where it was defeated. That is the key complaint here, that in locating another site for Pineview, a building was not redesigned for the site -- namely, the existing Broadway Tunnel area and the surrounding neighborhood.

"In a redesign, both open space and density must be addressed so that the housing will be compatible with the existing physical conditions in the neighborhood." (Vesta Kirby)

Response

Sections IV.A Land Use and Zoning, and IV.F. (Growth Inducement) discuss impacts of the project on the vicinity which could result from a Use District reclassification of the site. The second paragraph on p. 37 states, "The project . . . would result in an intensification of residential uses and of facilities serving senior citizens." The last paragraph on p. 67 states, "Rezoning of the project site from RM-2 . . . to RM-4 . . . could set a precedent for similar rezoning of property in the area." The last two sentences in the last paragraph on p. 67 state, "The Department of City Planning has recently conducted planning studies of the nearby Chinatown area and is examining permanent zoning proposals for the Chinatown area. The City Planning Commission, in approving or disapproving this project and any rezoning proposals prepared by the City Planning Department, will provide direction for development in the area."

Subsequent to the publication of the draft EIR, permanent zoning controls were approved for the Chinatown area by the City Planning Commission, at a public hearing on February 19, 1987. The permanent controls are scheduled to be reviewed and considered for adoption by the Board of Supervisors sometime in March or April of 1987 (a hearing date had not been scheduled as of this writing). The permanent controls are similar to the Chinatown Interim Controls in effect from July 24, 1986 to January 24, 1987 (City Planning Commission Resolution No. 10761). The permanent controls have virtually the same use and height districts and FAR limits as the Interim Controls.

Section II (Project Description) of the Final EIR for the 1055 Stockton Street (Orangeland) site (83.412E certified May 2, 1985) describes the portion of that proposed project which would have contained uses similar in type and density to the proposed Pineview project. The last paragraph on p. 17A of that EIR states, "The Trenton Street Building [portion of the 1055 Stockton Street project] would be 100 feet high, rising 11 stories above Trenton Street, and would contain 70 units of low income, elderly housing and common multi-purpose rooms, comprising 39,650 gross square feet." Figures 2-9 pp. 18 to 25 of the 1055 Stockton Street EIR show model, floor plans, and building sections of the development that was proposed for that site.

Though the number of residential units for low income seniors and the physically handicapped, the community center, and overall square footage of these uses for the Pineview project is comparable to the same uses proposed as part of the 1055 Stockton development, the building designs and height of the two projects are not similar.

See response on pp. 122 to 124 of this document about the proposed rezoning of the site.

ADJACENT USES

Comment

"Why has there been no mention of the Head Start Pre-School located 25 feet away from the proposed Pineview site in the operation 8:30 AM to 4:30 PM on weekdays?

"Why has there been no mention of the construction of the new building at the True Sunshine Church across Mason Street from the proposed Pineview site?

"It is to be noted that in this immediate neighborhood are already many parks and recreational areas available. Namely:

"1. The Public Schools: ○

Yick Wo - 2245 Jones at Greenwich.
Garfield Elementary School - 420 Filbert at Kearny Street
Jean Parker - 840 Broadway at Mason.
Commodore Stockton Elementary School - 950 Clay Street at Stockton.
Francisco Middle School - 2190 Powell Street at Francisco.

"2. Private Schools: ⊙

Sts. Peter & Paul - Filbert & Powell.
St. Mary - Stockton & Clay.

"3. Parks: △

St. Mary Square - California & Grant.
Portsmouth Square - Washington & Kearny.
Washington Square - Powell & Union.
Huntington Park - Taylor & Sacramento.
The Mini Park - Broadway at Taylor.
Ina Coolbrith Park - Vallejo Street at Mason.
The New Virginia Wales Park - Broadway at Mason.

"4. Public Housing Areas: □

North Ping Yuen - Broadway & Powell.
West Ping Yuen - Pacific & Powell.
Senior Housing - 990 Pacific Ave.

"5. Playground & Recreation Centers: ⬡

North Beach Playground & Pool - Mason & Greenwich.
Chinese Recreation Center - Mason & Washington.
Chinese Playground - Sacramento & Stockton.

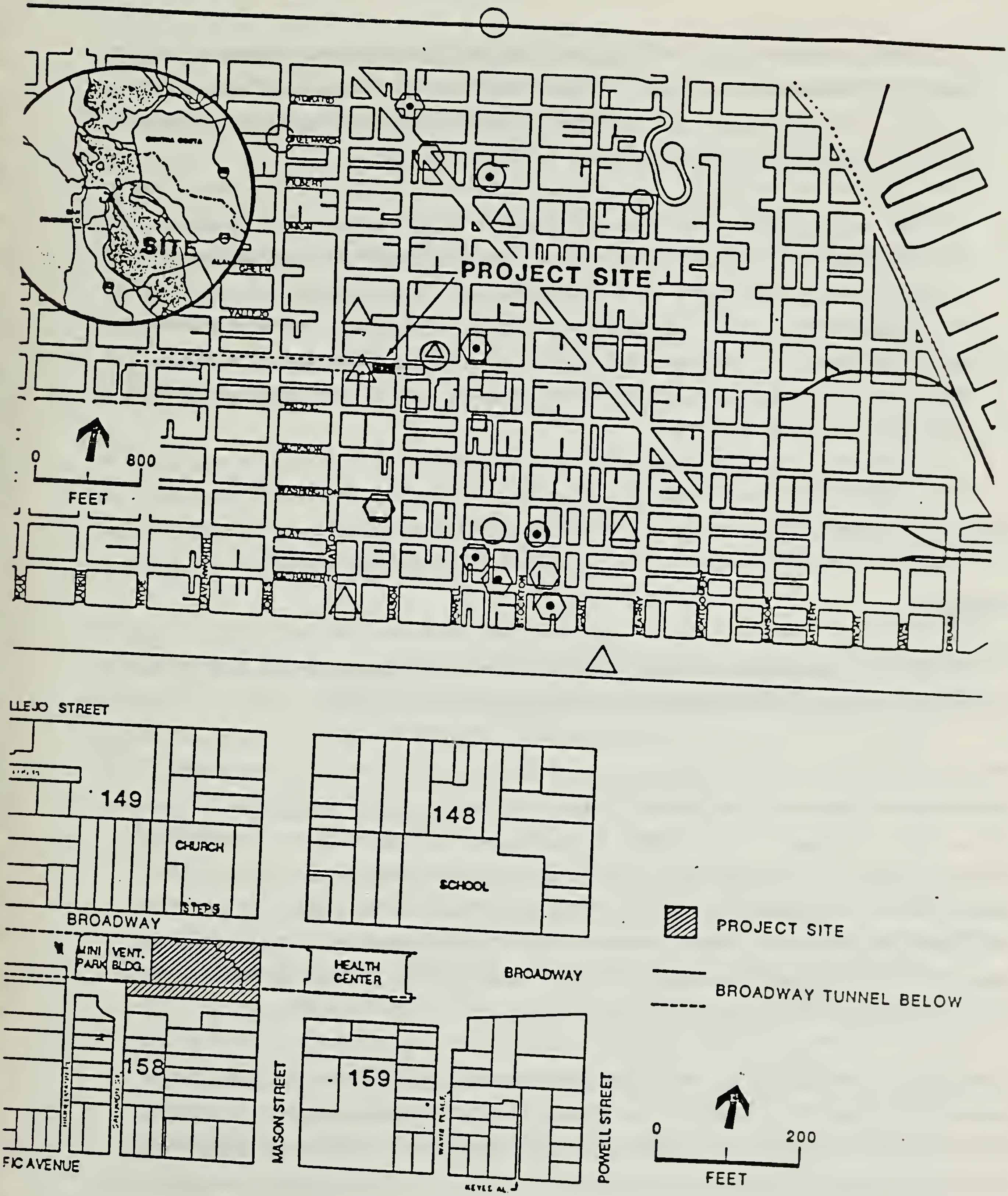
"6. Community Service Recreation Centers: ⬡·

YMCA - Sacramento at Stockton.
YWCA - Clay at Powell.
Camaron House - Sacramento & Stockton.
Salvation Army - Powell at Broadway.
Telegraph Hill Community Center - 660 Lombard at Mason."
(Melinda Pon)

[see Attachment B on p. 111 of this document, which was submitted as part of this comment]

Response

Section III A (Setting, Land Use and Zoning) pp. 21 to 27 of the EIR, discusses adjacent land uses in the vicinity of the proposed Pineview project site. The discussion describes the general intensity and types of uses in the site vicinity; each



ATTACHMENT B

: ESA

FIGURE 1
PROJECT LOCATION
PINEVIEW

individual establishment is not identified. The EIR provides a general discussion of uses in the project area, in order to indicate the context of development for the project. The EIR discusses the project in relation to this general context. Figure 7 on p. 22 graphically illustrates land uses in the site vicinity.

The Kai Ming Head Start Pre-School, referred to by the commenter, is located at 912 Broadway, directly north across Upper Broadway from the site. The True Sunshine Chinese Episcopal Church, also referred to by the commenter, is located at 1430 Mason Street, across Mason Street one-half block south of the site (not directly across Mason Street). Both the Head Start Pre-School and True Sunshine Chinese Episcopal Church locations are identified as nursery and religious uses, respectively, on Figure 7, p. 22 of the EIR.

MASTER PLAN POLICIES

Comments

"The EIR has not addressed important issues such as the open space area needed in the neighborhood for both the elderly and the very young." (Vesta Kirby)

"The draft EIR fails entirely to address one of the major, if not the most important, environmental impacts of the proposed project: the loss of public open space. Although not currently developed, the 'air rights' or 'land' above the Broadway tunnel is in fact public open space. This public resource has not yet been developed for public use, only because of a lack of funds, not because of any lack of need for such space of lack of enthusiasm on the part of the neighborhood. Even in its current undeveloped state, this open space provides much needed light, air, vistas and a feeling of openness in an area of the city where such resources are greatly needed.

"A decision to give away this public open space for any special or restricted use, no matter how worthy the cause, robs the city of a potential developed open space in the long-term; takes away the undeveloped open space benefits provided in the short-term, and sets a potentially dangerous precedent for development of other public open space for private or restricted use in the future (i.e., reservoirs, the west end of the Broadway tunnel, undeveloped cul-de-sacs of city streets, etc.)" (Nielsen Rogers)

"Another principle involved here is whether or not active streets are out of bounds for building sites. There are similar sites all over the city where buildings can be erected on the air rights in the middle of streets such as Broadway.

"Is San Francisco to be committed to a land use policy of legitimate leasing of air rights above streets? Bridging the streets of San Francisco by new buildings on top of traffic flow can enormously expand land use and become for investors a new gold mine.

"Here is a precedent. Attend it with care. If approved, it may be demise of more than just air rights. It may be the ruin of an aesthetic quality which we all are proud of in San Francisco." (Vesta Kirby)

"To adopt the principle of the legitimacy of constructing buildings on streets at an overpass opens the way to doing the same thing on the West end of the Broadway Tunnel on both sides of Hyde Street and on Geary Street on both sides of the Fillmore Street overpass and on Geary on both sides of the Masonic Ave. overpass." (Father McDonnell)

"Page 38. In the discussion about the relationship of this project to the S.F. Master Plan, we believe that air space over the Broadway tunnel does not constitute an 'Appropriate location' or 'Vacant public land'. Land, as defined by Webster's dictionary, is 'the solid part of the earth's surface, distinguished from sea, ground or soil, a country, region, etc'." (Melinda Pon)

Response

As stated on p. 38 of the EIR, "the project would develop housing on a site which is air-rights over public property (The Broadway tunnel and adjacent City-owned lot)". On p. 2.1 of the Residence Element of the Master Plan of the City and County of San Francisco (Department of City Planning, June 28, 1984), Policy 1 of Objective 1 states, "Encourage development of housing on surplus, under used and vacant public lands." The text under this policy heading begins, "The opportunities for development of housing on public property should be aggressively pursued. The City owns a number of sites which are underused. In some cases air rights of these sites may be made available for housing without interfering with their current public use." The proposed project would not interfere with the use of the Broadway Tunnel roadway right-of-way for vehicular traffic; thus, the project responds to this policy.

Prior to the construction of the Broadway Tunnel, the current air space over the Tunnel was a housing site (see Figures C&R 1 and C&R 2 on pp. 115 and 116 of this document). In order to construct the Tunnel, the housing was demolished. Thus, the project site was historically occupied by housing, and has not ever been designated open space.

As stated on p. 67 (Section IV.F., Growth Inducement), the limited number of lots which are currently vacant or occupied by underused buildings in the Chinatown - North Beach area, and the limited funding available for subsidized elderly housing makes it unlikely further development of a type similar to the project would be implemented as a result of the project. Development of the project on air-rights over public property would not necessarily create a precedent for future similar development, since future proposals for development on other air rights sites would be evaluated on the proposal's individual location and merits, by the City Planning Commission and the Board of Supervisors. See related response on pp. 195 to 197 of this document.

The City Planning Commission will decide whether the project as proposed will be approved, approved with conditions or disapproved.

Comment

"The draft EIR's discussion of the projects' responsiveness to the objectives of the Residence Element of the Master Plan is also misleading and inaccurate. Building a project in the middle of a public right of way is difficult to square with Objective 1, Policy 1 ('development of housing on surplus, underused and vacant public lands') or Objective 1, Policy 4 ('encourage infill housing on appropriate sites in established neighborhoods'). Similarly, it is difficult to see how a project that requires spot rezoning, approval to build in the middle of a street, a conditional use height authorization, a rear yard variance, and a variance for property line windows can be baldly [sic] described as addressing Objective 2 ('to increase substantially the supply of housing without overcrowding or adversely affecting the prevailing character of existing neighborhoods'),

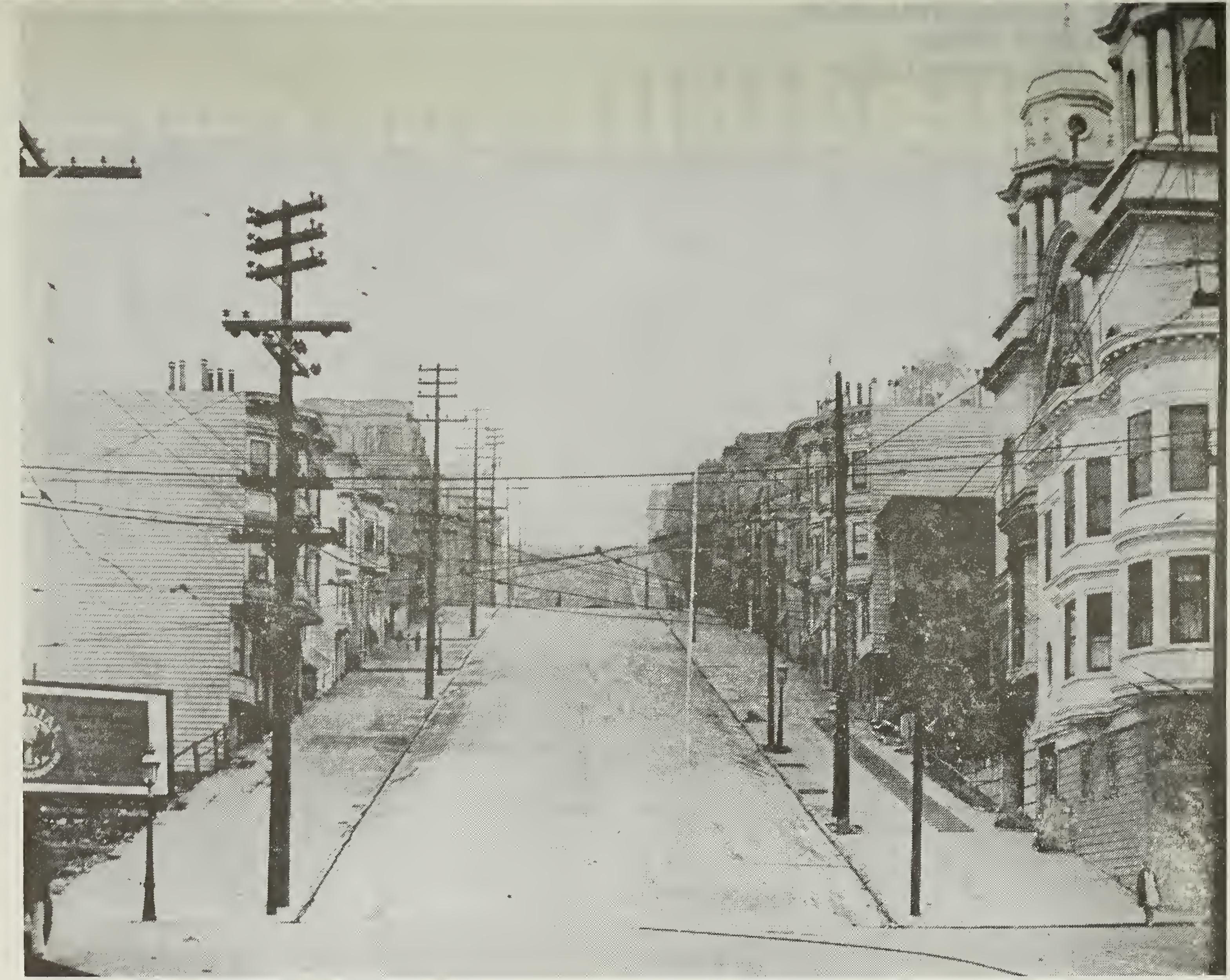


FIGURE C&R 1
PHOTOGRAPH OF UPPER BROADWAY AND NORTHERN PORTION OF SITE PRIOR TO CONSTRUCTION OF BROADWAY TUNNEL

SOURCE: SAN FRANCISCO ARCHIVES

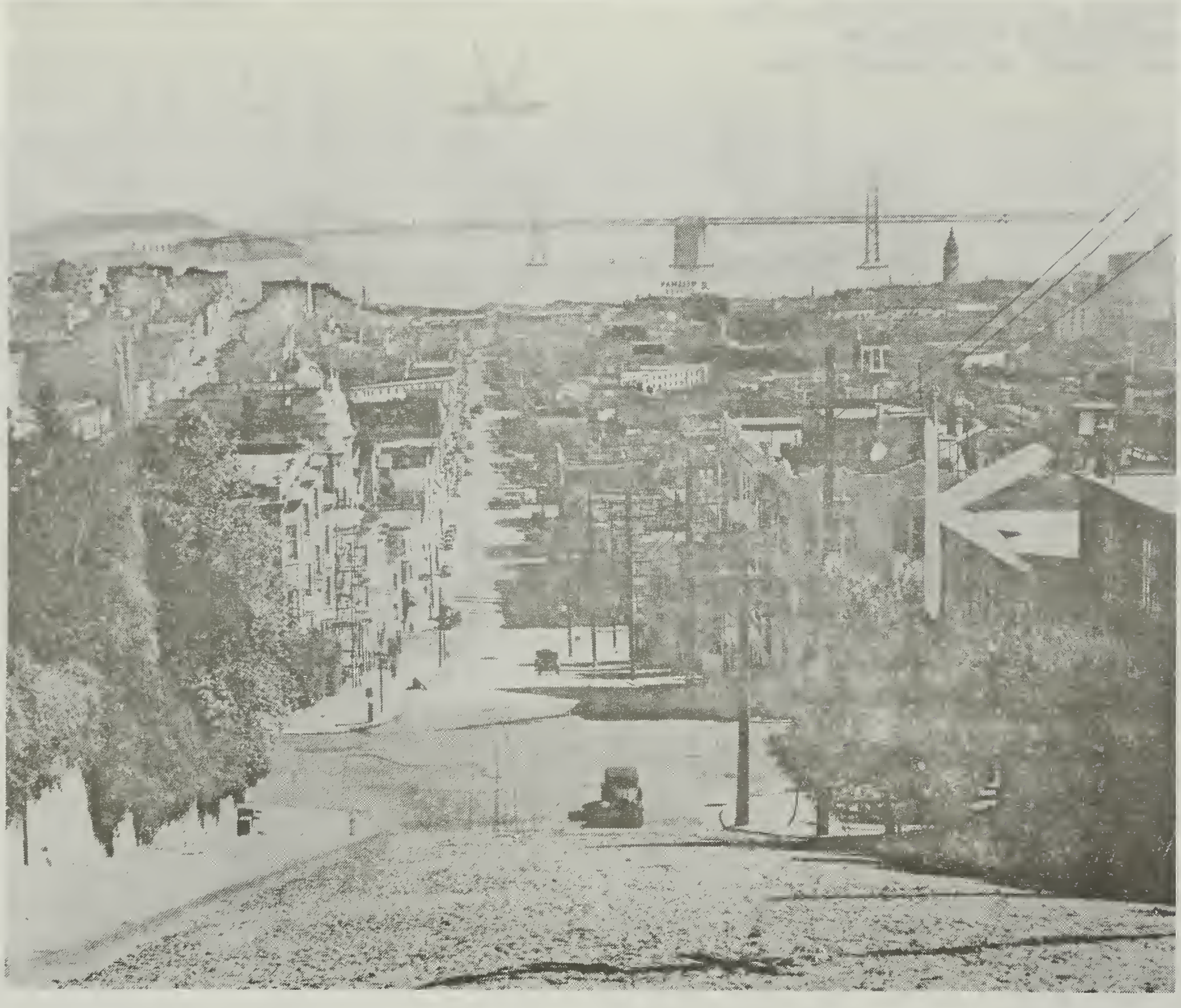


FIGURE C&R 2
PHOTOGRAPH OF UPPER BROADWAY
FROM JONES STREET PRIOR TO
CONSTRUCTION OF BROADWAY TUNNEL

SOURCE: SAN FRANCISCO ARCHIVES

either Policy 1 ('set allowable densities in established residential areas at levels which will maintain neighborhood scale and character') or Policy 2 ('encourage higher residential density in areas adjacent to downtown and in neighborhood commercial districts where higher density will not have harmful effects').

"The EIR should be amended specifically to address the potential negative environmental effects of constructing in the middle of a street. From a zoning and land use standpoint, a project like Pineview that is requesting exemption from most of the zoning rules applicable to the site would be less conspicuous if located on an in-fill lot in the middle of a built-up city block; in contrast, such a building located in the middle of a public right of way sticks out like a sore thumb.

"Since neighbors and property owners are entitled to assume that buildings will not be built in the middle of public rights of way, which they customarily count on for light and air, any deviations from this rule should be stringently scrutinized, and the environmental effects of zoning exceptions more seriously weighed. A troublesome precedent is being set here with implications that go far beyond rezoning or the granting of variances, particularly in neighborhoods like Russian Hill, North Beach, and Telegraph Hill, where numerous public rights of way exist as landscaped open spaces. These issues, and the precedent being set, must be explicitly addressed in the EIR." (Rose Chin, BTPC)

Response

The proposed project site is not 'in the middle of a public right of way', but is located on air rights over a public right of way (Broadway). As discussed in Section II.B. (Project Description - Location on pp. 9 to 11 of the EIR) and response on p. 104 of this document, the project site consists of air rights over a public right of way (the Broadway Tunnel), but does not involve construction (beyond temporary construction-related activities) encroaching on the Broadway Tunnel roadway. The project would be located adjacent to the corner of Mason Street and Upper Broadway, as discussed in the EIR; the project would incorporate the adjacent easement as a light and air easement for apartment windows. In the long term, the proposed project building would stand out visually to a lesser degree, at such point as the present site of parking for Alfred's Restaurant (Lot 1, Assessor's Block 158) is eventually developed. Since the Alfred's parking lot site is currently underutilized, given its RM-2 zoning, it is possible that the site will eventually be developed. If this site were developed, the Pineview project building would then be a part of continuous development along the western side of Mason St. The location of Lot 1 is illustrated on Figure 1, Project Location of the EIR (see p. 119 of this document).

All site-specific environmental effects of the proposed project are discussed in the EIR (see response on p. 90 of this document). The relationship between the project and applicable objectives and policies of the Residence Element of the Master Plan is discussed on pp. 38 to 39 of the EIR. The project would respond to Objective 1, Policy 1, as it would be sited on City-owned air-rights and would include a City-owned lot. The discussion of Policy 4 of Objective 1 of the Residence Element of the Master Plan on p. 2.2 begins, "In established neighborhoods new housing construction should be encouraged: on vacant sites which are not designated for open space." Because the Pineview project site is vacant and is currently zoned for residential development, the project would respond to this Policy. Prior to construction of the Broadway Tunnel, the site was occupied by housing (see response on pp. 113 to 114 of this document). The relationship between the project and Objective 2 and the Policies 1 and 2 of Objective 2 can be clearly understood if supporting text is read. The first sentences of Policies 1 and 2 on p. 2.4, state respectively, "In establishing allowable residential densities, consideration should be given to the prevailing building type in the surrounding area. . . . moderate to high densities presently exist in established residential areas adjacent to downtown and should be maintained."

The City Planning Commission, as part of its actions on the proposed project, will make a determination on whether the project, on the balance, conforms with the policies of the City's Master Plan and the policies added to the City Planning Code by Proposition M.

Comment

"Page 38, last paragraph, line 4: Please strike 'housing authority' and substitute Pine [sic] Yeun." (Alice Barkley)

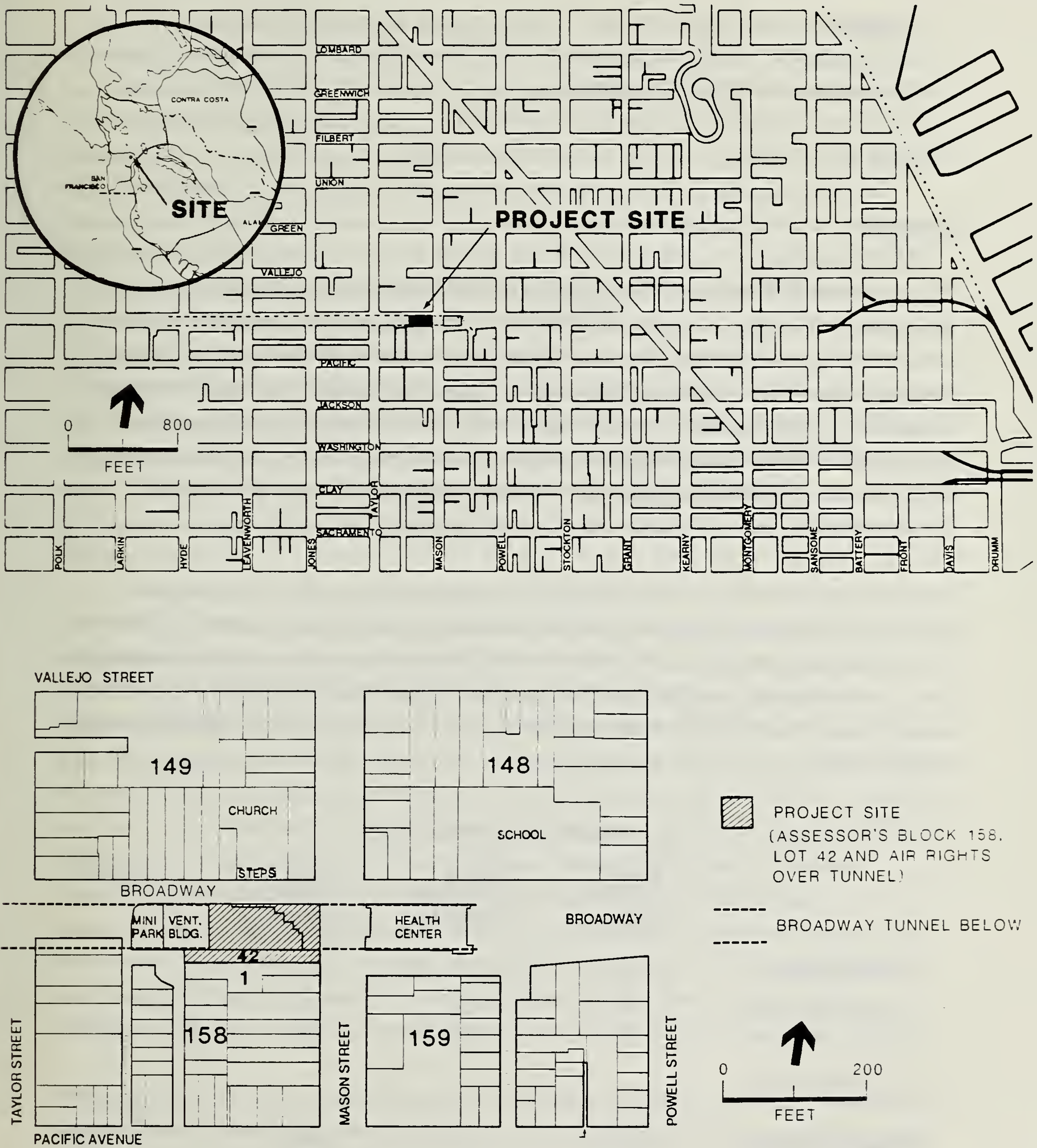


FIGURE 1
PROJECT LOCATION
PINEVIEW

SOURCE: ESA

Response

Commenter's reference is inaccurate.

ZONING

Comment

"As apparent justification for the project's seeking a conditional use variance from the 40 ft. residential height limit, the EIR refers to several highrises in the neighborhood, such as 999 Green and Royal Towers on Taylor Street. It was precisely the building of these intrusive and inappropriate highrises that led to the establishment of the current height limits. The battle to set such height limits here and elsewhere was long and well-fought. The buildings which were built before the battle was won should be used to justify the limits themselves, not to justify the granting of a variance from them." (Nielsen Rogers)

"Even with the inclusion of the easement area, however, the project at its proposed density of 70 units is an enormous building that requires virtual spot rezoning of the site in question. As Figure 8 on p. 24 of the draft EIR shows, the neighborhood surrounding the site is predominantly zoned RM-2, RH-2, and RH-3. The 70 units proposed exceeds the allowable densities in either an RM-2 or RM-3 district, even with the doubling allowed for senior housing:

	Number of Allowable Units			
	RM-2 (1 unit/ 600 gsf.)	RM-3 (1/units/ 400 gsf.)	RM-4 (1 unit/ 200 gsf.)	Proposed
10,640 gsf. site*				
-Regular Housing	18	27	53	
-Elderly Housing	36	53	106	70
12, 615 gsf. site				
-Regular Housing	21	32	63	
-Elderly Housing	42	63	126	70

(*Excluding area of sewer easement)

"Nowhere in the draft EIR does the sponsor point out that this major rezoning (or upzoning) is being proposed against a background of significant efforts to downzone the surrounding neighborhoods. The sponsor repeatedly singles out the 30-story Royal Arms, the 25-story 999 Green Street, the 11-story Ping Yuen project, and three 5-and-6-story housing projects to justify spot rezoning of the Pineview project. These very buildings, built 20-30 years ago and widely regarded as unattractive and out of scale with the neighborhood, figured prominently in motivating the neighborhood to seek the protection of the current zoning districts over a decade ago. More recently, the establishment of interim controls in the Chinatown Residential/Neighborhood Commercial District, the Chinatown Community Business District, and Nob Hill, along with recent efforts to lower height limits in RH-1 and RH-2 districts, all demonstrate the city-wide concern over protecting the existing scale and patterns of neighborhood development. The voters of San Francisco ratified these sentiments only one month ago by passing Proposition M, which was aimed primarily at keeping San Francisco's neighborhoods and downtown intact. The draft EIR must be amended to include a full discussion of these important developments in order to properly evaluate the sponsor's request to rezone the site in question.

"In summary, the zoning and land use impacts of the proposed project appear to be seriously understated. The inescapable facts are as follows: against a background of significant neighborhood and city-wide efforts to downzone the area, the sponsor is proposing to build a 70-unit structure in the middle of a public right of way, in an RM-2 zone that currently allows only 18-21 units of regular housing to be built (or 36-42 units of elderly housing), depending on whether the city-owned easement is properly aggregated into the lot size; that such a structure requires virtual spot rezoning (and upzoning) of the site in question; that wedging this number of units, plus a nearly 5,000 gsf. senior community center being relocated from another site, requires conditional use authorizations for both height (to go to 58' in a 40' zone) and use; that the only existing buildings in the area that are of a scale and density comparable to the proposed project were built 20-30 years ago and led to the imposition of the current zoning districts as neighbors sought to prevent such buildings from being built in the future.

"Although no one doubts the good intentions or purposes of the sponsor, the environmental impacts from a zoning standpoint appear to be very significant, and the draft EIR should be amended to clearly and fairly describe these impacts and to fully assess the compatibility of the project with the existing neighborhood in light of substantial downzoning efforts." (Rose Chin, BTPC)

Response

The rezoning of the site from RM-2 to RM-4 for the proposed project would not be a 'major rezoning' as stated by the commenter. The rezoning would affect only the site, and would not involve any other lots. The proposed rezoning of the project site would be for the purpose of enabling the construction of housing for low-income senior citizens and physically handicapped persons, and thus would not create a precedent for rezoning other lots for the development of private, market-rate residential development (see also discussion of potential growth-inducing effects of the project on pp. 66 to 67 of the EIR).

The history of zoning changes in Russian Hill, Chinatown and other areas of San Francisco is not relevant to how the proposed rezoning of the Pineview project site may or may not affect or induce future rezoning proposals and decisions on those proposals (see pp. 66 to 67 of the EIR and response on pp. 113 to 114 of this document).

The proposed project would not include a redesignation of the height and bulk classification for the site (see response on p. 106 of this document). The project would require Conditional Use authorization for exceeding 40 ft. in height in an R-District, but would not exceed the 65 ft. height limit for the site. The Conditional Use authorization request would be heard before the City Planning Commission, to allow public review of the proposed buildings' design, scale and height in relation to the site vicinity.

The project would be subject to review by the City Planning Commission, of its conformance with the eight Priority Policies established with the passage of Proposition M (see response on p. 107 of this document).

Discussion of the existing scale of buildings in the area is included in Section III.B (Urban Design Setting). Discussion of overall age, density (scale), and architectural style in the site vicinity (within two blocks of the site) is intended to provide the reader with an understanding of the existing character of development in the site vicinity. The buildings mentioned by the commenter are not characteristic of prevailing scale in the area. This is recognized in the second full sentence on p. 31 of the EIR which states, "the site vicinity is primarily characterized by two- to three-story buildings." (See also responses on pp. 137 to 139 of this document).

As stated in the last sentence of the second paragraph on p. 38 of the EIR, the project would address Objective 2, Policy 3 of the Residence Element of the Master Plan. Supporting text of this Policy on p. 2.5 of the Residence Element states "This [dwelling unit] method of calculating density encourages larger units and is particularly appropriate for lower density neighborhoods . . . In other areas, which consist mostly of taller apartments and which are well served by transit, the density might more appropriately be controlled by number of bedrooms rather than number of units. In this way, the city's housing stock could better meet the diverse needs of its residents which increasingly are characterized by smaller households . . ." The proposed project and zoning reclassification would address this Master Plan policy.

On p. 39, the last two sentences of the third paragraph are deleted, and are replaced with the following:

> Under RM-4 zoning, development of up to 40 residential (450 sq. ft. studios) units with 40 parking spaces (one for each dwelling unit) on two levels, not specifically designed for seniors and the physically handicapped, with no variances to Code requirements, could be constructed on the site. This assumes that all units would face a rear-yard, public street or alley, or other open area as required by City Planning Code Section 140, unlike the proposed project and alternatives in this EIR. This also assumes the rear-yard open space would be provided, bulk limits would be met, and the structure would be a total of six stories tall as with the proposed project. A maximum of 60 residential units specifically designed for seniors and the physically handicapped, with 12 parking spaces, with no Code variances required, could be constructed on the site under RM-4 zoning using the same method of analysis. The 70 units of housing for seniors and physically handicapped occupants and the senior community center proposed as the Pineview project would therefore represent the maximum development project for the site under RM-4 zoning.

The center of Table 1, Project Characteristics, on p. 12 of the EIR, under the heading UNIT DENSITY is replaced with the following:

COMPARISON OF RM-2 AND RM-4 ZONING CLASSIFICATIONS

Zoning District	Basic Density	Maximum Permitted Non-Elderly/ Handicapped Units /b/ On The Site	Bonus Density /c/	Maximum Permitted Elderly/ Handicapped Units /d/ On The Site	Units In Project
RM-2	1:600	21	1:300	42	0
RM-4	1:200	63 85 (efficiency) units /e/	1:100	126	70

The following are added as footnotes to Table 12:

/b/ The parking requirement under Section 151 of the City Planning Code would be one space for each dwelling unit.

/c/ Under Section 209.1(m) of the City Planning Code, an increase of up to 100% of the basic allowable number of residential units is allowed for residential developments designed for and occupied by senior citizens or the physically handicapped.

/d/ The parking requirement for dwelling units as defined by Section 209.1(m) is one-fifth the number otherwise required in the district in which the units are located.

/e/ Section 209.1(e) of the City Planning Code permits units containing no more than 500 square feet of net floor area to be counted as equal to three-fourths of a dwelling unit in the RM-4 districts.

Comment

"No parking is provided at all for the senior community center being relocated from Pine Street. This senior center is expected to draw 150 visitors a day and require 7-10 staff members on a daily basis, some of whom are volunteers. At 4,700 gsf., the senior community center is just under the 5,000 gsf. threshold that would trigger Section 151 of the Planning Code's requirement that 19 to 25 parking spaces be provided, depending on whether the center is considered an outpatient clinic or restaurant or both.

"In light of the fact that the senior community center's area is only 6% short of triggering this parking requirement, the Planning Department should carefully consider whether common areas such as bathrooms, halls, etc. properly should be allocated to the center for purposes of assessing its true size." (Rose Chin, BTPC)

Response

The interpretation of the City Planning Code parking requirement (under Section 151) for the senior community center is determined by the activities that would occur in the center. Since the predominant activity in the senior center would be serving meals to area residents, then the parking requirement for restaurants is most closely applicable. Table 151 (Section 151) of the City Planning Code specifies a parking requirement for restaurants of one space for each 200 sq. ft. of occupied floor area, where occupied floor area exceeds 5,000 sq. ft. The total area of the senior community center in the proposed project would be about 4,700 gross sq. ft., as stated in the EIR on p. 11. The measurement of gross sq. ft. is calculated based on the definition under Section 102.8 of the City Planning Code; in general, gross floor area is defined therein as "the sum of the gross areas of the several floors of a building . . ., measured from the exterior faces of exterior walls. . ." Occupied floor area is defined in Section 102.9 of the Code as "floor area devoted to, or capable of being devoted to, a principal or conditional use and its accessory uses. For purposes of computation, 'occupied floor area' shall consist of gross floor area, . . . minus the following . . . (b) Exterior walls of the building . . . (d) Restrooms, . . ." Thus, the occupied floor area of the senior community center would be less than the 4,700 gross sq. ft. of gross floor area, and would therefore not be subject to requirements for parking under Code Section 151.

URBAN DESIGN

SCALE

Comment

"I . . . make slight issue with a few of the photographs used in the book as reference. As you know, when someone mentions something about this structure, you go to your book as a reference guide.

"The photograph on p. 28 is taken, of course from the street. But in the wide angle approach to it, it implies that -- the hill is fairly low, for one thing. It also does not include the actual site; it includes the open space of the site. The site is approximately twice as long as this -- as long as this space in the photograph.

"The next photograph in the book, which is the photomontage photograph on p. 42, refers to two buildings in the back, 999 Green Street and 857 Green Street. Perhaps this is just location, but in the report it mentions this area is a dense area, and these buildings further that implication, when, in truth, this area is surrounded by four-story to two-story buildings, which are not included, of course, because this building is drawn in.

"The next photograph, which is on p. 43, gives you an approximation of what the building would look like, which is okay except for that is on the shadow side of the building, and this drawing does not include any effects of the shadow on the street adjacent to it, which is the north side of Broadway.

"It also, as well as the one above it, identifies the Transamerica Building, which I am sure most people know exists without location, without a statement about it. In other words, it implies that this building is already downtown and is not necessarily in a residential neighborhood.

"I have also these photographs, some alternative photographs to whoever puts this book together, as alternative views of the same situations so show that there are two viewpoints, not necessarily negative viewpoints in either case, but, you know, just to give a general overview of the area. . . . [see pp. 42 to 47 of this document]

"Then there is also one that shows the plaza of the church and the fact that people do use that plaza for sun, et cetera." (Dennis Hearn)

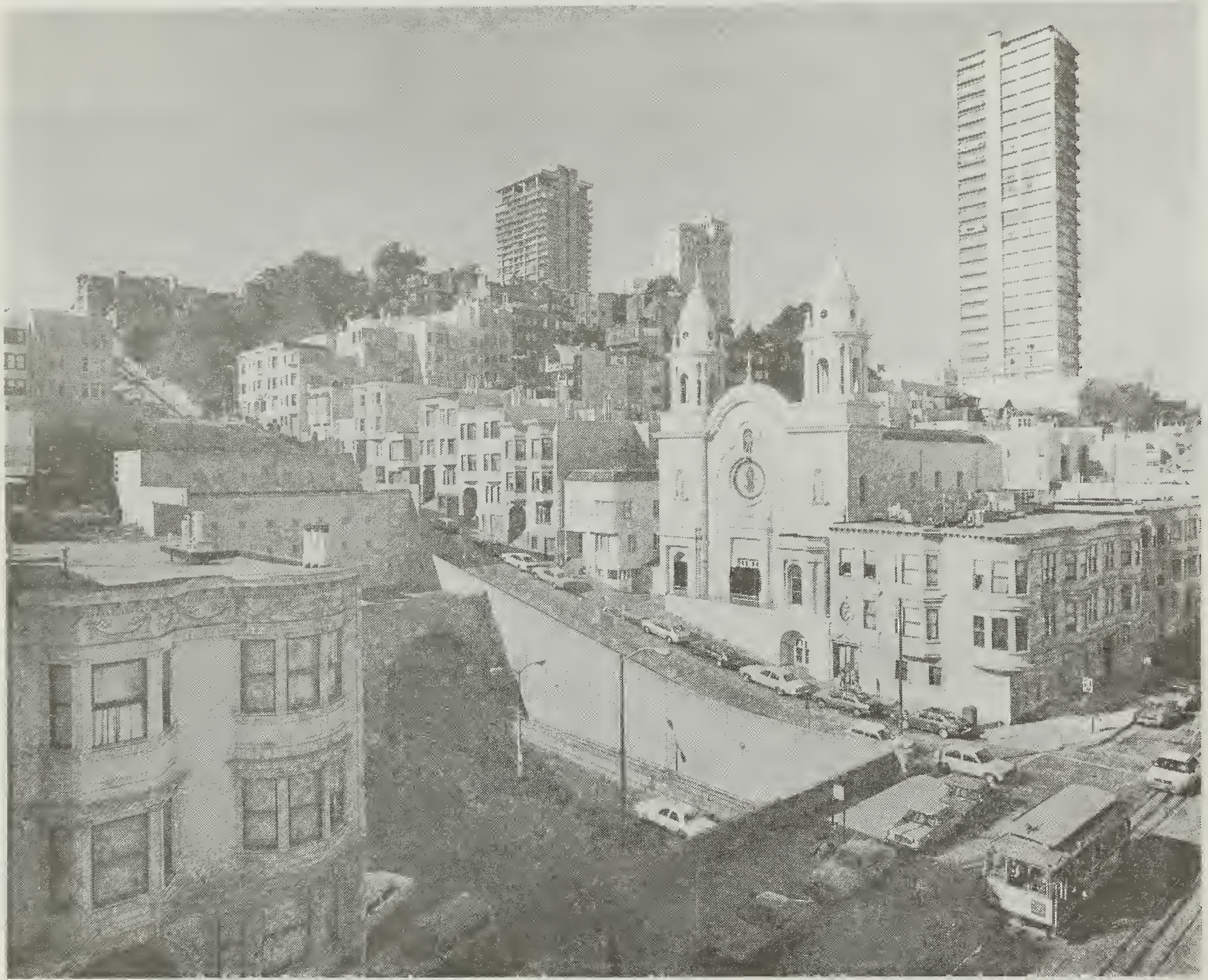
Response

Figure 10, p. 28 of the EIR shows most of the project site, except for the southwest corner. The entire length of the City-owned vacant lot is not visible in the photograph; however, the width along Mason Street of the entire site, including the City-owned lot and air-rights over the Broadway Tunnel, is shown in Figure 10 of the EIR.

(Area Photo Submitted by Dennis Hearn)

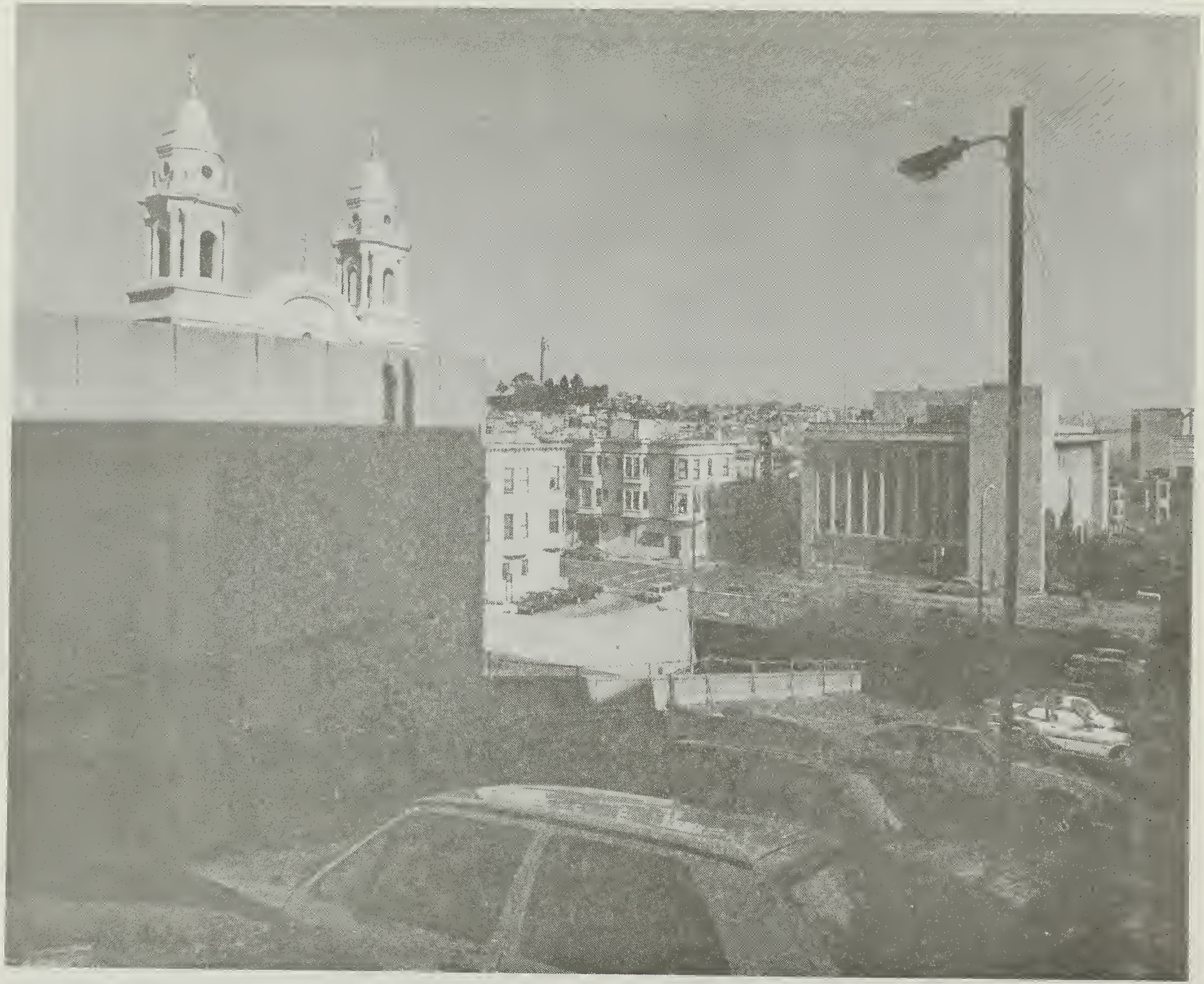
(Area Photo Submitted by Dennis Hearn)

(Area Photo Submitted by Dennis Hearn)



(Area Photo Submitted by Dennis Hearn)

(Area Photo Submitted by Dennis Hearn)



(Area Photo Submitted by Dennis Hearn)

The photograph in Figure 10 is of the site viewed from across Mason St., looking northwest at the site and Our Lady of Guadalupe Church and residential buildings on Upper Broadway adjacent to the Church. This photograph viewpoint was chosen because it portrays one of the views of the site and its vicinity which would be most affected by the project.

Discussion of the prevailing scale of development in the site vicinity, on pp. 29 and 31 of the EIR, includes the second full sentence on p. 31 which states, "The site vicinity is primarily characterized by two- to three-story buildings" (see response on pp. 137 to 139 of this document).

The photographs in Figure 13, p. 42, and Figure 14, p. 43, are photomontages wherein a rendering of the exterior of the proposed project is superimposed on a photograph of the site and surroundings. Buildings which are labeled in the two photomontages are the most visually prominent features in the photographs, and are identified as points of reference for readers who may not be thoroughly familiar with visual aspects of the site surroundings.

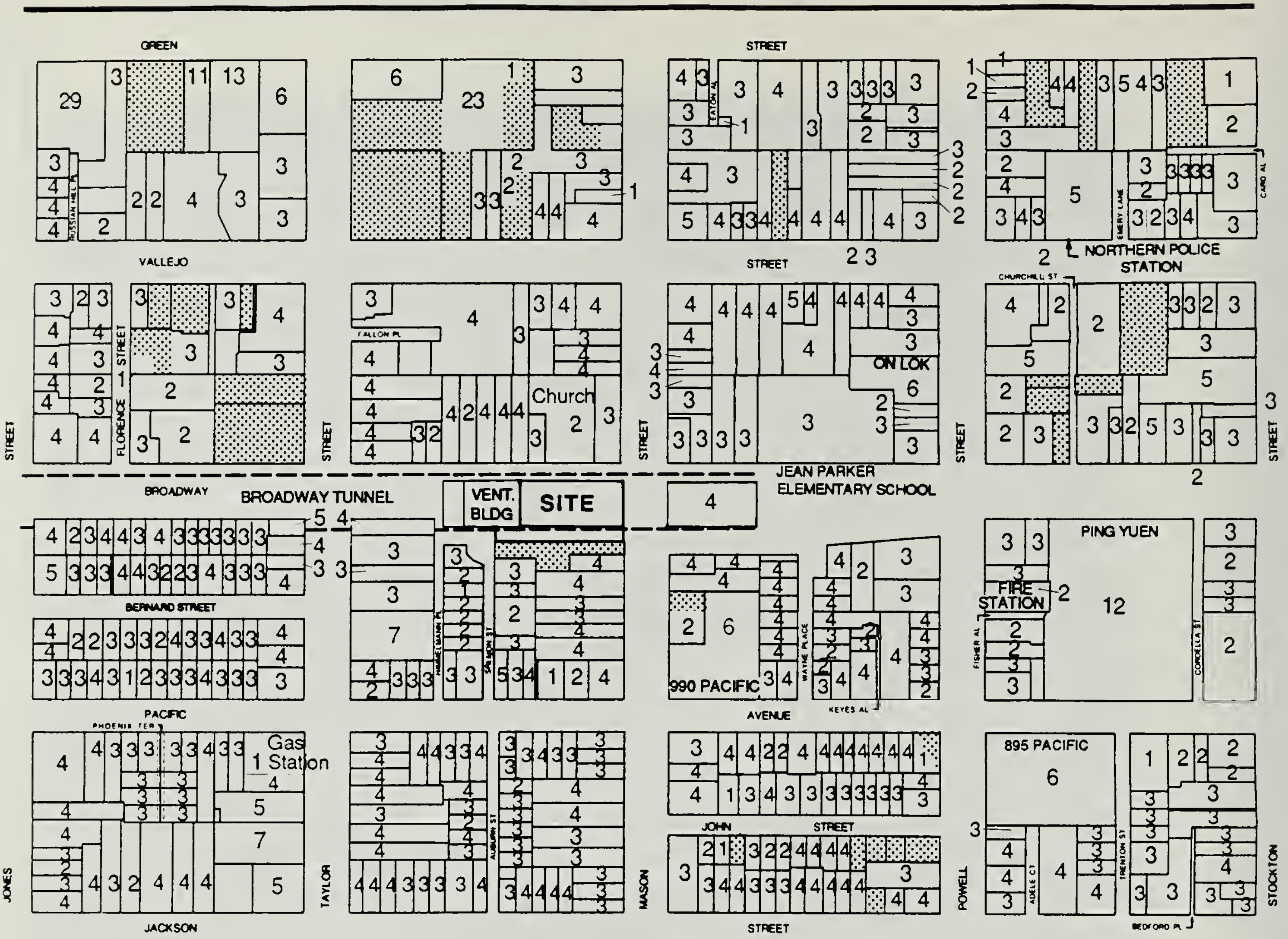
The photomontages in this report are intended to show the height and bulk of the project, and facade detailing to the extent that it has been developed. They are not intended to show shadows from the proposed building. (See also comments and responses regarding shadows on pp. 146 to 151 of this document).

Comment

"[O]n p. 23, the fact that the four- to six-story apartment buildings in the Russian Hill neighborhood -- we were asking if during the final EIR, if a map such as on p. 22 could also show the heights of those buildings per block so that we would be able to determine the actual stories of the ones that are close by to see how out of character this might be." (Joanne Nichols)

Response

Above-grade heights (in stories) of buildings within two blocks of the project site are shown on p. 134 of this document, which is added as Figure 11a after p. 31 of the EIR.



LEGEND

4	BUILDING HEIGHTS (IN STORIES)
▨	VACANT, OPEN SPACE OR SURFACE PARKING

FIGURE 11a
EXISTING BUILDING HEIGHTS (IN STORIES)
IN THE PROJECT VICINITY
PINEVIEW

SOURCE ESA

DESIGN

Comment

"Appropriateness of Building Height, Scale and Bulk. The proposed project seeks variances to increase density and bulk. The graphic description of the project shows a development that, in our opinion, is out of scale with the mostly residential character of the surrounding area. . . . The project as designed is too large and bulky and would be a static and unresponsive addition to the existing neighborhood."

"The report states that 'the project would address Objective 2 (of the Master Plan), to increase substantially the supply of housing without overcrowding or adversely affecting the prevailing character of existing neighborhoods'. The report states that 'the project would address Objective 2, Policy 1 - to set allowable densities in established residential areas at levels which will maintain neighborhood scale and character.' These are misleading statements because:

"The graphic descriptions of the project shows a blockbuster of a building that would dwarf most of the buildings in the neighborhood.

"The project as designed shows a poor relationship to the Guadalupe Church with exception of a view of the church across the open corner at Mason and Upper Broadway. The open space created for the residents and the community is mostly dedicated to vehicular circulation and the desired park-like setting in front of the church is a token gesture that is in shadow most of the winter afternoons of the year. (see p. A-22 of the Appendix).

"(Page 2, p. 3, 1st par. p. 23, 2nd par.; p. 48, 3rd, 4th par.) The statement (p. 2) describing the project as 'intermediate in scale when compared with surrounding development' is misleading. The mass and bulk of the project as designed would dwarf the surrounding development and would reduce the street spaces that bound the project (running East - West) to dark windswept alley ways. The comparison of the project to 25 and 33 story buildings in the general area is meaningless. Those buildings caused public outrage which, in part, resulted in the height controls now in force. The projects that are comparable in scale to the proposed project are some of the most ungainly and hulking buildings in the city. For example, the housing project at 990 Pacific is not the pattern of development that supports the objectives in the Master Plan for the neighborhood.

"The project, with its excessive bulk, would not be harmonious with the visual relationships with older buildings. The setbacks and the surface treatments shown are not convincing solutions to reducing the apparent bulk of the block in this context (Objective 3 policy 2).

"The project, with its density doubled by the proposed zoning change, would be an extreme contrast in scale, size and shape with development in the immediate neighborhood and it would stand out in excess of its public importance.

"The project is in direct opposition to Objective 3, Policy 6 - 'Relate the bulk of buildings to the prevailing scale of development to avoid an overwhelming or dominating appearance in new construction'. The setbacks and treatments shown in the project description do not make the proposed 70 units any less dominating. It is a function of density, not architectural cosmetics." (Ann Ludwig, RHN)

"Page 42. The photomontage illustrated on p. 42 of the EIR looks out of scale, especially for a 6-story, 58 feet tall building.

"Page 45. It should be recognized that, although there are buildings in the vicinity that are taller than 6 stories, most of the residential dwellings adjacent to the proposed project are only 2-3 stories tall." (Melinda Pon)

"The EIR's analysis of the project's relationship to the City's Urban Design Plan Policies is also overstated and should be substantially revised to be more objective and fair. Although some efforts have been made to include aesthetically appropriate setbacks and building materials, the height and bulk of the project seriously violates (and eliminates) the contours of the hill, blocks more views than necessary because of its location in the middle of a street, is much larger than all of the 2-3 story neighboring buildings, seriously reduces the prominence and views of Guadalupe Church and the function of its front plaza as a gathering place." (Rose Chin, BTPC)

Response

The relationship of the proposed project to policies of the Residence Element of the Master Plan is discussed on pp. 38 to 39 of the EIR. The relationship of the proposed project to applicable Objectives, and Policies of the Urban Design Element of the Master Plan is discussed in Table 2, pp. 45-47 and on p. 48 of the EIR. The six-story building would be taller and more visible than most existing residential structures in the vicinity, which are mainly three and four stories tall. Because of the slope of Russian Hill, the roof of the project would be at about the same level as the ventilation building. The project would be shorter than the Our Lady of Guadalupe Church, and would be of comparable scale to newer housing structures for low-income persons in the vicinity, such as the six-story On-Lok House building (1441 Powell Street), the six-story 895 Pacific Ave. building, and the six-story 990 Pacific Ave. building. The City Planning Commission, in its action to approve, approve with conditions or disapprove the project, will decide whether the project, on balance, conforms to the Master Plan as a whole. The Zoning Administrator will consider compatibility with the City's Master Plan and Section 305 criteria at the variance hearing. The Board of Supervisors will consider the City Planning Commission's findings and action in its decisions on the proposed project.

References in the EIR to existing residential buildings in the site vicinity, mainly, "two to three" stories tall, are changed to, "three to four" stories tall, in the second full sentence of the first partial paragraph on p. 31; the first part of the first sentence of the first full paragraph on p. 31; the first part of the first sentence of the second paragraph in Table 2 (Relationship Between Applicable Urban Design Policies of the Master Plan and the Proposed Project) on p. 45, and the second sentence of the first paragraph in Table 2 on p. 47; and the first sentence of the third paragraph on p. 48.

The commenter refers to Urban Design Element Objective 3, Policy 2, which states, "Avoid extreme contrasts in color, shape, and other characteristics which will cause new buildings to stand out in excess of their public importance"; the commenter also quotes Objective 3, Policy 6. As stated in the third paragraph on p. 39 of the EIR, the project would exceed the maximum allowable residential density for the site under an RM-2 designation, but would be less than the maximum density allowable for apartments specifically built for and occupied by seniors and the physically handicapped, under the proposed RM-4 redesignations for the site.

The EIR was in error regarding Conditional Use authorization for exceeding bulk limits. The project would be within bulk limits for the site. Section 102.11(c) of the Planning Code specifies that for an upward sloping lot, height is measured in relation to ground elevation. Thus, bulk dimension limitations apply only to the portion of the building which exceeds 40 feet in height, as defined in the City Planning Code. (See response on pp. 106 to 107, and Staff-Initiated Text Changes on p. 242 of this document.)

Most of the residential buildings in the immediate vicinity of the site are four stories tall. The project, at six stories tall, would be two stories higher than most nearby residential buildings (see Figure 11a, p. 134 of this document). At the rear (western) edge of the site, the building would be four stories tall and would, at that portion, be of comparable height to residential buildings on the north side of Upper Broadway. The proposed rezoning of the site would permit a greater number of residential units on the site than permitted under the current RM-2 zoning, but would not increase the maximum building envelope permitted for the site. The project building would not exceed the existing maximum allowable height or bulk limits for the site (see responses on p. 106 and on p. 122 of this document). Thus, the size or scale of a building is not necessarily a function of the unit density as stated by one of the commenters.

Discussion of shadow effects of the project was included in the Initial Study (see pp. A-21 to A-25 of the EIR, and comments and responses on pp. 146 to 151 of this document).

Discussion of wind effects of the project was also included in the Initial Study (see p. A-21 of the EIR),and concluded that because the height of the project would be only a few floors above surrounding buildings, and would create a complex (as opposed to flat) facade geometry, it is not expected that the project would significantly effect wind acceleration at the pedestrian level.

As discussed on pp. 45 to 49 of the EIR, the project would block views of Our Lady of Guadalupe Church from Mason St. in the site vicinity, and would partially block views of downtown high-rises from Upper Broadway (see response on pp. 144 to 145 of this document). It would also block views of the Church and of Telegraph Hill from residences and streets at the north end of Salmon Street and Himmelmann Place above the site to the southwest.

ARCHITECTURAL RESOURCES

Comment

"In evaluating the impact of the project on urban design, the draft EIR fails to accurately describe the character and historical significance of the neighborhood's architecture and draws highly debatable conclusions concerning the extent to which the project meets the Urban Design Elements of the City's Master Plan.

"In establishing the design setting, the draft EIR singles out the Heritage survey but neglects to mention that the survey does not cover twelve of the sixteen blocks shown on Figure 11 (p. 30, draft EIR). Consequently, the statement that only 21 buildings were rated by Heritage within a two-block radius of the site is misleading and inaccurate as a statement about the architectural significance of the surrounding buildings, many of which have never been studied by Heritage and are indeed significant.

"In fact, Heritage has just concluded that an application of its rating criteria would result in granting an 'A' (or at the minimum a 'B') rating to Guadalupe Church, views of which will be substantially diminished by the project. Moreover, the Russian Hill Neighbors board is actively involved with Heritage in establishing a national register historic district starting just one-half block away from the proposed project. The architectural significance of the area is already sufficiently recognized and documented in guide books to cause numerous tourists to alight from the Mason Street cable car and visit Guadalupe Church on their way up to the architecturally historical areas of Russian Hill. The draft EIR should be amended to reflect these facts." (Rose Chin, BTPC)

"I would like to clarify certain statements made in this draft EIR concerning San Francisco Heritage ratings of buildings in the vicinity of the project.

"Most importantly, I want to make clear that Heritage has not surveyed the project site nor buildings adjacent to it. Our Chinatown area survey, (the closest area surveyed by Heritage as of this date) did not extend North of Broadway or West of Powell. I would request that statements made on pp. 29 and 46 of the report be modified to reflect the reason nearby buildings are unrated.

"Further, I would like to specifically address the significance of our Lady of Guadalupe Church across from the project site. Although as I have stated, this structure is unrated for the reason cited, based upon the criteria employed by the survey, this building would be given an 'A' or 'B' when it is rated by Heritage.

"- 'A rated' buildings are individually the most important buildings distinguished by outstanding qualities of architecture, historical values, and relationship to the environment. All A-group buildings are eligible for the National Register, and of highest priority for City Landmark status.

"- 'B rated' buildings are of individual importance by virtue of architectural, historical, and environmental criteria. These buildings tend to stand out for their overall quality rather than for any particular outstanding characteristics. B-group buildings are eligible for the National Register, and of secondary priority for City Landmark status." (Mark Ryser, Heritage)

Response

The commenter does not indicate why she believes that the project would impede the establishment of a historic district near the site. Neither Heritage nor the Landmarks Preservation Advisory Board expressed concern about the effect of the project on the establishment of a historic district in their comments (see above and also pp. 143 to 144 of this document).

The first sentence of the first full paragraph on p. 29 of the EIR states that, "about 21 buildings . . . were rated by Heritage . . .;" thus the commenter's reference to a statement of, "only 21 buildings were rated by Heritage . . ." is incorrect.

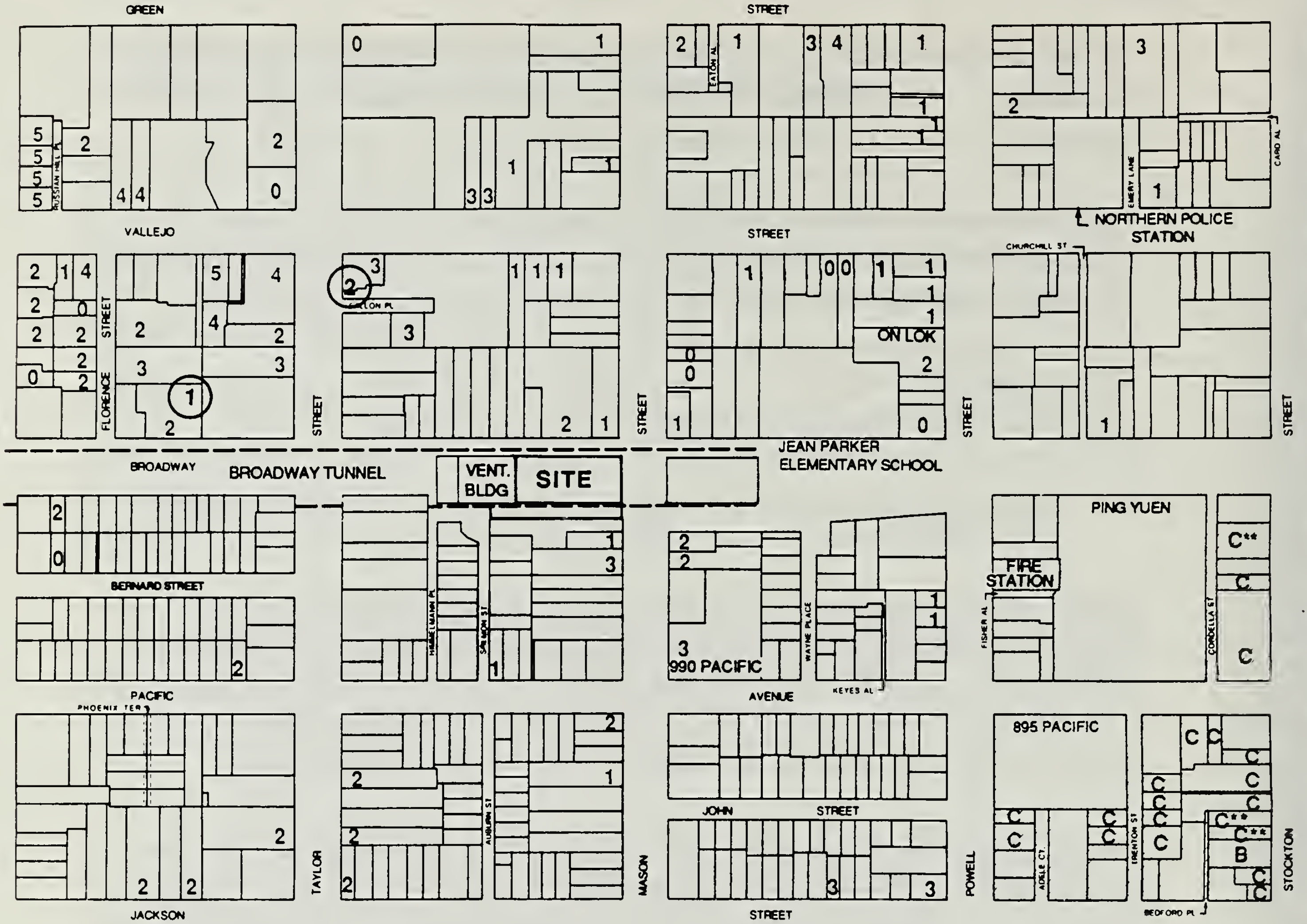
The general age and architectural detailing characteristic of existing, older development in the site vicinity is discussed on pp. 29 and 31 (Urban Design, Setting). Discussion of the Heritage Survey, on p. 29 of the EIR, states that the Heritage Survey is preliminary and that ratings from the Heritage Survey are subject to review and approval by the Department of City Planning. The following is added as the first full sentence of the first partial paragraph on p. 29 of the EIR:

> The preliminary survey by Heritage did not include blocks in the site vicinity north of Broadway or west of Powell Street.

Three buildings located on the west side of Stockton St. between Pacific Ave.and Broadway, which were rated by Heritage, were not designated as having been rated on Figure 11, p. 30 of the EIR. The preliminary ratings by Heritage of these buildings are added to a revised Figure 11, and the two blocks on the map on Figure 11 which were surveyed by Heritage are also indicated (see p. 142 of this document).

The Our Lady of Guadalupe Church, on the north side of Upper Broadway, has not been rated by Heritage as of publication of this document. The Church's rating in the 1976 Department of City Planning's Architectural Inventory ('2' out of a possible high of '5') is discussed on p. 29 and is included on Figure 11 on p. 30. The 1976 City Planning survey rated buildings only on their architectural qualities. It did not evaluate them for their historical value. The following is inserted as the first full paragraph on p. 31:

> The Our Lady of Guadalupe Church, on the north side of Upper Broadway just west of Mason St. at Broadway, was constructed in 1912. The existing Church building replaced the original church structure, constructed in 1875, which was destroyed in the 1906 fire after the earthquake. Our Lady of Guadalupe Church is of the Mission Revival style, popular between 1890 and 1920. The Mission style is characterized by a simplicity of form, with round or basket arches as a prominent feature of the stucco or plaster facades. The



LEGEND

CITY LANDMARK BUILDINGS	LANDMARK NUMBER
① Atkinson House	97
② House of the Flag	46

KEY TO RATINGS

1 - 5	DCP Rating (1976, Citywide Architectural Inventory)
C - B	Heritage Rating (1985, Preliminary Survey, Chinatown)
☐	Blocks Included in Heritage Preliminary Chinatown Survey

FIGURE 11
ARCHITECTURAL RESOURCES
IN THE PROJECT VICINITY
PINEVIEW

SOURCE ESA, DCP AND HERITAGE

Church has a recessed, rectangular main entry surrounded by a round arched secondary entry on the west, and a rectangular bay with basket arches openings on the east. At the second level, a circular niche with a painted plaster figure is surmounted on both sides by arched niches holding sculpted figures.

Comment

"On Section A-30 of the Environmental Impact Report, [the EIR] . . . mentions that there are no objections to that site on grounds of being a historic, ethnic or religious place of special significance, that it would not cause disruption of anything that is of historic or ethnic or religious activity -- I wish to contradict that finding of the EIR on p. A-30." (Father McDonnell)

Response

Comment noted. The commenter is referring to Item 13 of the Initial Study for the project. The air-rights over the Broadway is not itself a prehistoric or historic archaeological site, and is not occupied by a property of historic or cultural significance to a community or ethnic or social group, as indicated by Item 13a on p. A-30 of the EIR. The EIR analyzes potential effects of project construction and operation on religous activities at Our Lady of Guadalupe Church. In particular, potential impacts on religious services at the Church resulting from noise and vibration during construction are discussed on pp. 55 to 57; measures to mitigate these identified effects are discussed on p. 70 of the EIR. Shadowing of the Church steps and the sidewalk in front of the Church resulting from the project are discussed in the Initial Study on pp. A-21 to A-24 of the EIR.

VIEWS

Comment

"Page 31 paragraph 3. It appears that the project will partially block the view of Our Lady of Guadalupe Church from the west of Nob Hill.

Page 46 column 2 paragraph 2 sentence 6. It should be noted that if the project were located further south on the site, it would further minimize blockage of the view of Our Lady of Guadalupe Church from Mason Street." (Landmarks Preservation Advisory Board)

"The multi-million dollar cable car renovation has provided tourists with spectacular views of San Francisco. One of the most exquisite places in San Francisco is the beautiful church of NUESTRA SENORA DE GUADALUPE with its Spanish architecture. This historic church is a link of San Francisco not only to European tourists, but to the Latin-American countries whose heritage San Francisco shares. To put that church in an alley, blocking its visibility, would be a serious mistake." (Father McDonnell)

"It would reduce our open space and block the views of many neighbors in this area." (Joan Burrows)

"San Francisco is a beautiful city. It is said that it is the most beautiful in the world. One of the main sources of income of the city is the tourist. It has attracted millions throughout the year. They all come to look at the spectacular views.

"But that is changing. Things are being lost. Like, for example, we used to ride the cable cars. But now those spectacular views are being blocked.

"Now, we still have the view; we have kept it on one side. A couple of weeks ago, the San Francisco Progress published a view of the side that is intended to be blocked. When you come riding the cable cars, there is a view of the tunnel where you can still look at those houses with the beautiful bay windows which are very well known, because they are the property of San Francisco. Because that would interfere with the view and then, instead, we would put a high construction. It would be like a box, a box with bad taste, with just nothing but windows." (Clementina Garcia)

Response

Section IV.B. (Urban Design, pp. 41 - 49 of the EIR) discusses impacts of the proposed project on views in the site vicinity. The project would block views of the Our Lady of Guadalupe Church from points along a 10 ft. to 20 ft. portion of Mason Street, south of the site, as stated in the EIR on p. 48. The Church is partially visible looking north from the intersection of Mason and Sacramento Sts. on Nob Hill. The following is added after the last full sentence of the last paragraph on p. 48 of the EIR:

> The roof of the project would be visible in views north from the intersection of Mason and Sacramento Streets on Nob Hill, and would partially block views of Our Lady of Guadalupe Church from that location.

The southern portion of the project site includes a 10-ft. utility easement (Lot 42 of Assessor's Block 158), which must remain unobstructed for access to underground sewer lines; the project could not be built on top of this easement.

Table 2, pp. 45-47 of the EIR compares the proposed project to applicable Urban Design Policies of the Urban Design Element of the Master Plan. Table 2 discusses the impacts of the project on views in the site vicinity. The first sentence of the last paragraph on p. 48 states, "the project would not block views east along Upper Broadway of San Francisco Bay and the Bay Bridge." The second sentence of the last paragraph on p. 48 states, "The project would block views of lower stories of downtown office buildings from points along Upper Broadway and from residences on the north side of Upper Broadway between Mason and Taylor Streets." The sentence which begins as the last sentence on p. 48 and continues at the top of p. 49 states, "the project would block views of the Church and of Telegraph Hill from residences and streets and sidewalks located at the northern end of Salmon St. and Himmelman Place, immediately southwest of the site."

The fourth sentence of the last paragraph on p. 48 is revised to read (new language is underlined):

> The project would block views of the architecturally rated Our Lady of Guadalupe Church and views of buildings west of the Church along Upper Broadway from points along a 10 ft. to 20 ft. portion of Mason Street, south of the project site, including views from cable cars traveling along that portion of Mason Street.

Comment

"The report describes the building as if the 'six-foot tall elevator over-ride located atop of the structure' will be the only thing that makes up the roofscape of the building (which is very important since the top of the structure is visible from places on the hill). Based on the graphic information describing the project, there will be plumbing vents, heating and ventilation machines and other clutter that will become the foreground view for residents west of the project. These sorts of impacts should be included in the Mitigation Measures section of the report. The report does not address these impacts or other potential problems such as the roofscape of the proposed project." (Ann Ludwig, RHN)

Response

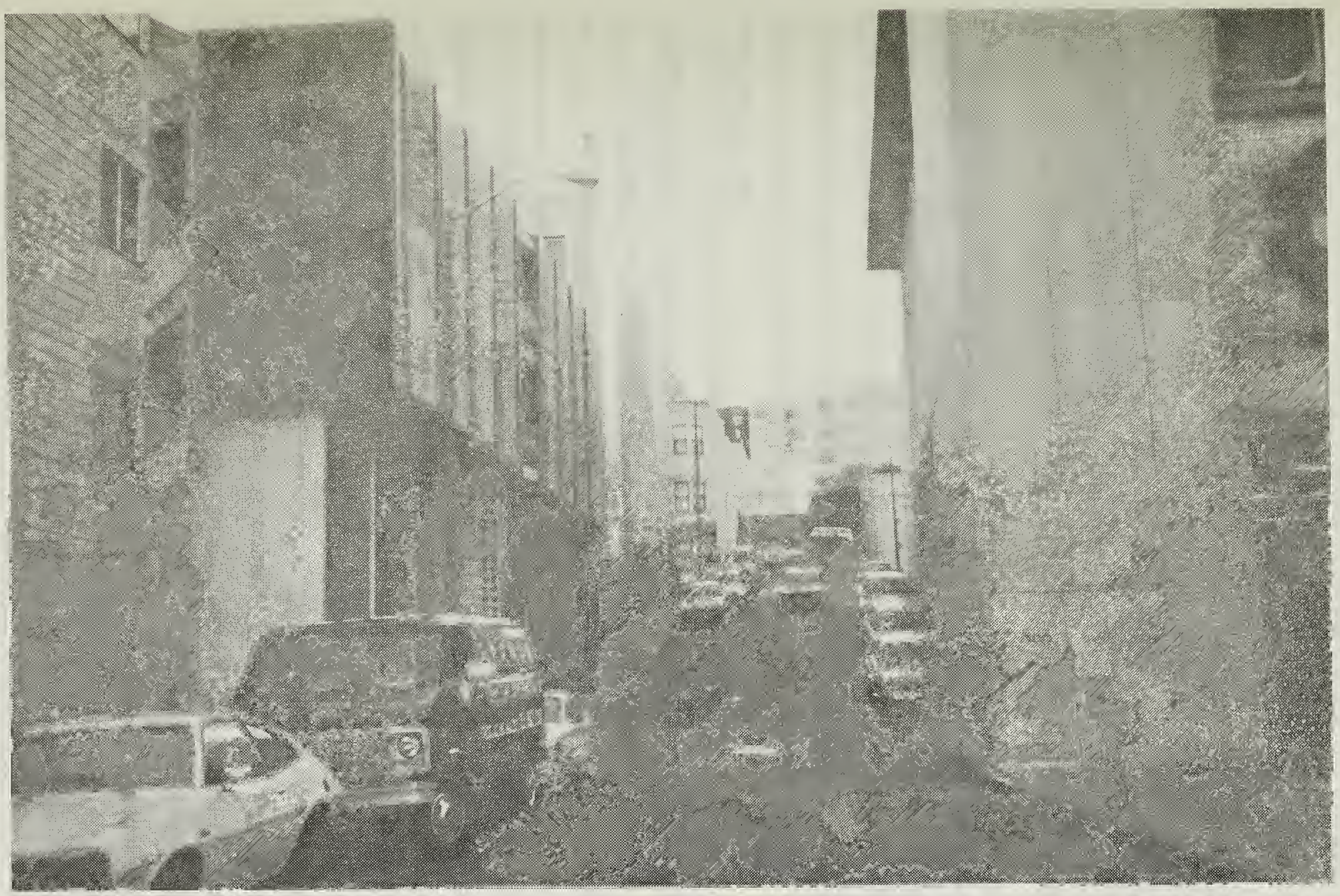
The second sentence of the third paragraph on p. 48 of the EIR states, "Because of the slope of Russian Hill, the roof of the project would be at about the same level as the ventilation building, adjacent to the site to the west." Thus, the roof of the proposed project building would be visible from viewpoints at elevations higher than the site to the west. The vents and other required roof top equipment would be painted in a comparable color to that of the roof, to minimize the visual prominence of the equipment. The roof covering would be tar and gravel, a common roof material. There would not be any equipment on the roof (such as solar panels) which would cause glare effects in the surrounding area.

SHADOWS

Comment

"I have here a photo [p. 62 of this document] of the southeast corner of Mason and Broadway. You will notice that when the health center was built, it turned this portion of Broadway into an alley. The construction of the proposed Pineview housing will do likewise to the other portion of the Broadway.

"You know that an alley will create crime. I have been a victim a couple times on this street here. (Joe Lem)



(Area Photo Submitted by Joe Lem)

"28 million dollars of Federal money was given to upgrade Chinatown alley living not to make a new alley on Broadway's Russian Hill." (Father McDonnell)

"The building will create an alley situation on Broadway as it is presently designed. On p. 43, Figure 14, the building is rendered as though there is no shade falling on it or as though it does not shade the street. If you look at the picture, you'll see the medical building below it has the entire street in shade. I think that if this were properly rendered, the same thing would happen here with the building." (Vesta Kirby)

"Page 43. Figure 14 ignores the dark shadow that would be cast by the Pineview Project in the same way and more severely than the shadow cast by the Health Center on Broadway." (Melinda Pon)

Response

Comments regarding the creation of an alley on Upper Broadway are noted. The City Planning Commission will consider the commenter's statement that the project would create crime in the area surrounding the site as part of their decision on approval, approval with conditions or disapproval of the project.

The commenters are referring to the photomontage of the proposed project (Figure 14) on p. 43 of the EIR. The photomontage is intended to illustrate the visual aspects (height, bulk, facade detailing) of the proposed project building in relation to its surroundings. Photomontages are not intended to describe shadow effects. Discussion of shadow effects of the project on Upper Broadway adjacent to the site is in the Initial Study for the project, on pp. A-21 to A-25 of the EIR. As discussed on those pages, the project would add new shadow to Broadway and to sidewalks on Broadway at most times during the year. The project would not effect the width of Upper Broadway; it is already a narrow street adjacent to the site. Shadow diagrams are on file and available for public review at the Department of City Planning, 450 McAllister St. (see also response on pp. 126 to 133).

Comment

"Open Space. The City and the neighborhood has acknowledged a need for open park space in this area. The project sponsors have been urged to respond to this in the design of the proposed project. The open space that is suggested for the site in the report would be small, shaded by the proposed project for all but a few mornings of the year and a full third of the open space is dedicated for vehicular circulation and storage." (Ann Ludwig, RHN)

"In the August 15 Initial Study, the effects of the proposed project on shadowing were discussed at length, with particular emphasis on the fact that the project would cast substantial shadow on the front plaza and steps of Guadalupe Church, a major gathering place for parishioners before and after Mass. It was observed by you at the time that: 'The proposed project's front plaza would provide new open space, accessible to the public, that would not be shadowed during the early to midmorning hours when Church services are held.'

"This conclusion was based on the sponsor's representations about the nature of the front plaza at that time. The draft EIR now makes it clear that the 'front plaza' across from the Church is in reality a parking lot, not a plaza. On Sundays during Mass hours, the plaza is more likely to be filled with vans delivering prepared meals (scheduled deliveries are 10:40 a..m., 11:30 a.m., and 3:30 p.m., p. 52, draft EIR) or cars belonging to staff members or visitors. Consequently, it is unlikely that the parking lot will in any significant way mitigate the loss of the sunlit front plaza to the parishioners of Guadalupe Church." (Rose Chin, BTPC)

Response

The proposed project's plaza fronting the intersection of Mason Street and Upper Broadway would provide access to the parking spaces on the ground floor, and would contain two outdoor parking spaces.

The project would provide a 2,685 gsf plaza, (not including two outdoor parking spaces), fronting Mason Street, as discussed in the EIR on p. 11. About 2070 gsf of the Plaza would be public open space and the remainder (about 615 gsf, less than one-fourth), would be the driveway to the project's garage and manuevering area for the outdoor parking spaces. The public open space portion of this plaza would be pedestrian oriented, with trees, lawns and benches. Vehicle access and parking proposed from Upper Broadway would not cause conflicts with pedestrian use of the public plaza because the curb cut for the driveway at Upper Broadway would not be the principal access point for pedestrians to the open plaza. The lawn area would be separated from the driveway by trees and a hedge. Benches would be located along the Mason St. sidewalk, on the opposite side of the lawn area from the driveway. The last full sentence on p. 51 of the EIR states, "meals would be delivered to the senior center by van Monday through Friday." Vans would not make deliveries to the project on Saturday or Sunday. Thus, the driveway to the project's garage would not be filled with vans delivering food on Sundays during Mass hours as stated by the commenter. In combination with private outdoor terraces at upper levels, the open space plaza would exceed the projects' requirement for open space for dwellings designed for and occupied by senior citizens or physically handicapped persons under RM-4 Zoning designation (see p. 40 of the EIR).

A full discussion of shadow effects of the project is presented in the Initial Study (see pp. A-21 to A-25 of the EIR). The public plaza would not be shaded at 10:00 a.m. on any morning during the year; the driveway portion only would be shaded at noon in September; the entire plaza would be shaded at noon in December. At 3:00 p.m., the plaza would be partially shaded in June, and would be completely shaded in September, December, and March. Shadow diagrams are on file at the Department of City Planning, 450 McAllister St.

Comment

"For a project of this size and scope, this section [Shadow] of the report should be more specific in its findings. The report states only that 'no cumulative significant impacts have been identified'. The project would permanently disrupt the openness and access to sunlight that the site now offers." (Ann Ludwig, RHN)

"One subject, shadowing, appears to have been improperly executed at the initial study stage.

"Additional shadow studies are needed at this time to accurately assess the effect of the new design on shadowing." (Rose Chin, BTPC)

Response

Shadows from the proposed project were analyzed in the Initial Study which was published and distributed on August 15, 1986. Comments on the determinations in the Initial Study were due by August 25, 1986. The Initial Study concluded that shadow effects would not be significant environmental effects because the Church steps are not a public park property subject to Proposition K, nor are they a public space used on a daily basis by large numbers of the general public. The Initial Study recognized the function of the steps as a gathering place for the congregation, and described how shadows from the proposed project could interfere with the use of that space from fall to spring. From spring to fall, however, shadows from the project would not effect the Church steps.

No new shadow studies are needed since the studies done for the Initial Study were based on the same building configuration and location as the proposed project in this EIR.

The City Planning Commission, in its decision regarding certification of this EIR, will determine the adequacy of the analysis of environmental effects and will make the final determination of project specific or cumulative significant impacts.

TRANSPORTATION, CIRCULATION AND PARKING

CONSTRUCTION

Comment

"Construction Phase Impacts. The effects of increased traffic congestion, [noise and possible physical damage to the Guadalupe Church]...[is] discussed but not adequately presented. Here again, mitigating measures are not fully developed and are to be applied only after the start of construction.

"Transportation (Construction) - The report underestimates the traffic impacts during construction. The estimate of truck deliveries at an average of 2 per day and a peak of three per day seems overly conservative. For example, there will be times during the initial stages of construction where materials such as concrete will be delivered and the number of trucks per day will be more than the estimated amount. The estimated amount does not include construction delivery foul-ups and other unexpected circumstances. The actual number of truck deliveries will have major traffic impacts in this already congested area. The EIR should make more realistic estimates and as a mitigation measure, staging of the delivery trucks at another location is a possibility, allowing only one or two at the site at any one time. Also of importance are the effects of the construction on mass transit (Muni 30x bus line) that travels at peak traffic periods though the tunnel.

"- A study of how construction phase traffic might be staged off-site and managed on-site." (Ann Ludwig, RHN)

Response

During the estimated 24 weekdays necessary for construction of the foundation and building platform, one lane in each direction of the Broadway Tunnel would be closed. Relocation of traffic to the outside lanes along the walls of the tunnel would be coordinated with the Department of Public Works (see mitigation measure on p. 69 of the EIR). Placement and removal of formwork may require closure of one side of the tunnel for a short period of time.

Once the building platform is constructed, a ten-foot-wide construction staging area would be required on the south side of the building for steel and slab erection. After the building platform is completed, a five ft. wide scaffolding strip would be required on both the north and south side of the project site for installation of exterior wall framing.

All other staging and storage could be accomplished either on-site or off-site. Additionally, Upper Broadway street would be closed for the time necessary to install utility tie-in and hook ups.

The information on p. 50 of the EIR regarding the number of construction truck trips per day is based on information provided by the sponsors of the project. The first sentence of the second full paragraph has been revised to read (new language is underlined):

> During subsequent phases of construction (metal decking, steel erection and finishing) truck trips would result from material deliveries; there would be an average of two truck trips per day and a maximum of six truck trips per day.

Even though there would be a maximum of six trucks per day during the periods of time when concrete is poured for the slab and when steel deliveries are made for the building frame, there would only be two on-site at any one time if the dispatcher were to schedule them accordingly. These trucks would have no effect on the Muni 30X - Freeway Express line as they would be above the tunnel at the site. Additionally, the 30X Marina Express line operates only during the weekday peak commute periods. A mitigation measure is included as part of the project to minimize construction impacts on Muni operations. The third paragraph on p. 69 states that the project sponsor and construction contractor would ensure that no blockage of the Mason St. cable car tracks or of Upper Broadway traffic lanes would occur during construction (see also response on p. 154 of this document).

Comment

"The other thing that is not addressed is that the project says that they would be using the 10-foot easement for deliveries during the construction period and that Alfred's would be able to use Lot No. 1 for parking.

"I can't conceive of these huge trucks dropping off iron and steel and concrete using up only ten feet of that space. I think the EIR hasn't addressed that, whether or not they can actually pull that off. It was stated that they did not want to use Mason Street because of the cable cars.

"I don't see how these trucks, first of all, are going to get access from Mason Street to this 10-foot easement. I think it should be addressed how they're going to drop it off and not affect the parking lot, which has a direct effect on Alfred's Restaurant.

Also, the easement is used daily by pedestrians. I don't know if the EIR has done a pedestrian count on that area." (Al Petrie)

Response

The sponsor has stated that delivery trucks would be able to use the ten foot easement as they are generally no more than ten feet wide. Even though trucks would obstruct the driveway used for access to Alfred's Restaurant parking, this would be during the day and not in the evening when Alfred's is open for business. Once the foundation slab is built, construction materials could be stored on the site in the plaza area, and most truck deliveries could be accommodated from Upper Broadway adjacent to the site. As stated in the last paragraph on p. 69 of the EIR, a measure is under consideration by the project sponsor which would provide a temporary curb cut to the lot used by Alfred's to permit use of the parking lot during the construction period.

The first and second sentences on p. 51 of the EIR are revised to read (new language is underlined):

> If double-parking of trucks and other construction vehicles were to occur, the adjacent cable car tracks and southbound traffic lane could be blocked. It would be the project sponsor's responsibility to see that this would not occur, and a mitigation measure has been included to lessen the possibility that the cable cars and vehicular traffic would be impeded (see mitigation measure on p. 69).

TRAFFIC AND TRANSIT

Comment

"[W]hether this was intended or not, it looks as though they're intending to turn Broadway into a one-way street, since, in the picture, the cars are all sort of going uphill at that point. It looks like a couple of them have been rendered as such." (Vesta Kirby)

Response

Upper Broadway, between Mason Street and Himmelman Place, adjacent to the northern site boundary, is a two-way (east-west) street and would remain so. Development of the Pineview project at the site would not require any permanent change in traffic patterns on any street.

Comment

"Traffic and other congestion in this neighborhood is already a very serious matter and this development would add to the problem." (Joan Burrows)

"It is clear from the project description there would be traffic congestion of considerable consequence both during the construction phase and afterwards for the life of the project." (Ann Ludwig, RHN)

Response

The project description section of the EIR does not discuss transportation congestion. Transportation congestion is discussed in the Transportation Impact Section on pp. 49-53 of the EIR. Potential construction transportation impacts are analyzed both in the Broadway Tunnel and at the intersection of Mason Street and Upper Broadway. Appropriate mitigations are also identified. After completion of the project, vehicular travel to and from the site would be low and would not measurably contribute to traffic congestion in the vicinity of the site.

Comment

"The Broadway Tunnel is a major link between Highway 101 with its Golden Gate Bridge and Highway 80 with its Bay Bridge from San Francisco to Oakland. Heavy freeway traffic now passes through the Broadway Tunnel which was designed as a city street, not a freeway." (Father McDonnell)

Response

Impacts associated with construction activities in the Broadway Tunnel are identified on pp. 49-50 along with appropriate mitigation measures. Once the project is completed and occupied there would be no measurable increase in traffic in the tunnel as a result of the project.

Comment

"Project Impacts (Travel Demand) - The report treats these almost as if they are negligible. This is not the case. With 77 people plus about as many more for meals plus the family members, visitors, staff, etc. that will be travelling to the site, it is obvious that the project will have great impact on nearby Muni lines and on local traffic. There will be a Senior Center closing on Pine Street when the proposed project Senior Center opens. That means that a number of seniors will be travelling from the area surrounding the existing Pine Street Center and they may come by Muni or shuttle vans. This could lead to significant loads for the already crowded 30 line at mealtimes. The arrivals associated with mealtime at the proposed Senior Center could conflict with arrivals for services at the Guadalupe Church and have great unexpected impact." (Ann Ludwig, RHN)

Response

The EIR discusses travel demand from the project on p. 51 of the EIR. Projected trip generation includes staff, visitors and residents for both the apartments and the senior center. Only 35 person trip ends would occur during the p.m. peak hour which would result in an increase of about four Muni riders. This effect would not be noticable as it would be within daily ridership fluctuations. Trips to the senior center would be made between the hours of 9 a.m. and 1 p.m. and would represent about 40 Muni trips during this period. Muni load factors on routes in the project vicinity are high during the mid-day period but buses would be able to accommodate these riders although there would be additional crowding. Also, as stated on p. 51 of the EIR, the project would only result in minimal increases in traffic. Arrivals associated with mealtimes at the proposed senior center would occur only on Monday through Friday, and therefore would only create potential conflicts with arrivals for services at the Church on Holy Days.

Comment

"In addition to the POWELL/MASON cable car line and the 83-PACIFIC, Muni also operates the 30-STOCKTON and the POWELL/HYDE cable car line within 2 blocks of the project site." (Dan Wong, Muni)

Response

Comment noted. The third full paragraph on p. 32 of the EIR has been revised as follows (new language is underlined):

> The site is served by San Francisco Municipal Railway electric trolley, motor coach and cable car lines. The Powell and Mason Cable Car lines operate on Mason Street in front of the site. There are three other Muni routes within two blocks of the site, the 83-Pacific, the 30-Stockton and the Powell/Hyde Cable Car line (see Figure 12, p. 33).

PARKING AND LOADING

Comment

"[The proposed project includes] the 10-foot easement right adjacent to Alfred's parking lot. . . . When they take over the ten feet, Alfred's will not have independent access for 25 cars, therefore, I think, making the parking lot worthless to them because they can't get in and out. This would put another 25 cars out on the street." (Calvin Li)

"Where is the proposed replacement parking for Alfred's to be located during construction and after project operations? The parking spaces lost also affect the people of Our Lady of Guadalupe Church, True Sunshine Church on Mason Street, Jean Parker School on Broadway, The Health Center on Mason, The Chinese Hospital on Jackson Street, shops and restaurants on Powell & Jackson Street, both ON LOK Centers, S.F. Public Housing for the Elderly on 990 Pacific Ave., The S.F. Chinese Baptist Church Sunday School at Jean Parker on Broadway." (Melinda Pon)

"I have one little problem, though, and that is that I have a lease on the lot that is to the left of the proposed Pineview site, which is adjacent to the 10-foot easement that the city has. We use the lot to the left of that easement for parking.

"The restaurant, through its profitability, with some 30 people involved in the restaurant, is supporting 30 families. I think that if we have reduced parking in that area, which is critical as it is, would maybe have an adverse effect on the restaurant's profitability if we were to lose the parking space there, especially with the expanded, extended or expanded programs.

"It's the lot everybody wants to move around. I think it's Lot 1 of Block 158." (Albert Petrie)

Response

The site for the proposed Pineview project would include Lot 42 of Assessor's Block 158. Lot 42 would provide light and air access to 32 apartment units facing Lot 42. In the middle of the first paragraph on p. 40 of the EIR, it states that Lot 42, as an easement for the sewer system" . . . would remain open for access to the sewer line."

The temporary closure of the driveway through Lot 42 used for access to the parking lot for Alfred's restaurant is discussed in Section IV.C (Transportation Impacts). The last sentence of the first partial paragraph on p. 51 begins, "Lot 42 would be closed for three months," . . . The parking lot would be reopened after that time. The lot used by Alfred's restaurant is not a public parking lot. A mitigation measure is included on p. 69 that would allow the lot used by Alfred's restaurant to continue to be used during construction. This measure would have to be approved by the Department of Public Works. Should this measure not materialize, there would be no replacement parking. After project construction, Alfred's restaurant would continue to access their parking lot as they currently do.

Comments

"The environmental impact of this project on parking has been seriously underestimated in the draft EIR. Although the surrounding neighborhood is notorious for its acute shortage of street parking, no reference is made whatsoever to the status of parking in the neighborhood, nor have any independent studies of parking availability been done by the sponsor.

"The draft EIR seriously underestimates the potential parking needs of senior community center visitors and staff members and visitors coming to see the residents themselves. At present the project provides only 12 parking spaces, all for use by the residents only; a regular housing project of 70 units would require 70 parking spaces to be provided, while the Planning Code allows elderly housing projects to provide only one-fifth that amount, or 14. A variance is required to provide only 12 spaces." (Rose Chin, BTPC)

"Traffic and parking as well, we don't feel the impacts have been accurately addressed. During construction -- or during operation, we don't feel that 12 spaces is adequate for a development of this scale." (Ann Ludwig, RHN)

"Page 68. Statement on parking spaces for residents conflicts with that one made on p. 52. The parking spaces will also be used by delivery vans.

"Will there be any handicapped parking spaces available in the parking garage or immediately in front of the building?" (Melinda Pon)

"Page 53. Is this survey of auto ownerships credible? We realize that parking is critical in the area of the proposed project site. The limited number of parking slots (12) certainly will not address visitor parking or delivery parking. The Planning Commission should require more adequate parking." (Melinda Pon)

"Parking and traffic in this area is difficult (understatement) and congested already. It is already densely populated." (Debra Nicholson)

"If this project is built, I feel that there is definitely going to be a lot more traffic and a lot of visitors coming to visit them [project residents], whether it be doctors, relatives, or whatever.

"I would like to cite some statistics over the past ten or twelve years, in which within the two block radius of this proposed site -- the on-street parking that has been lost to the residents there.

"There have been 37 spaces lost on Mason Street around the cable car barn area between Jackson and Washington Street that is taken exclusively for the PUC, for the cable car workers there. Any residents who would dare park there are ticketed -- and towed, even.

"And No. 2. There are 12 parking spaces on Vallejo Street right on Powell, which is a red zone right now for police cars officially, but unofficially it;s police personnel's personal parking spaces.

"There are 12 spaces on Pacific Avenue between Powell and Stockton Street which has now been changed in the last couple years of years to parking meters good for one hour parking only.

"And Item 4. Approximately 35 parking spaces on Powell Street between the Pacific and Vallejo Street, which is, once again, installed with parking meters and additional yellow-blue zones due to commercial expansion from Chinatown pushing up, and a senior center on Powell Street.

"No. 5. Additional four parking spaces across the street from the proposed site for the Department of Public Health, which is zoned red, and a driveway right now which is lost.

"And the last major loss is No. 6, Jean Parker School, which is right down the hill from the proposed site, in which approximately ten or twelve parking spaces have been lost due to segregation, busing of students. It is used exclusively during the daytime for buses to bus the kids to school and to bus them home.

"That is approximately 110 parking spaces that have been lost to area residents there in the last ten to 12 years, and virtually nothing has been gained from it. I feel that with this new site, it will only increase more.

"From my past experience there is a senior citizen [apartment building] -- right now, up the hill, half a block up on Mason and Pacific Street -- which originally also had a variance for parking there, allowing guest parking in it so that people who come and visit senior citizens in that building can park in there. Since it's been built in the last couple years, those guest parking spaces have been taken out of the building -- about 12 spaces, I believe, in there. All these visitors must now fight with everybody else on the street looking for a parking space.

"The development at that time did not take into consideration that virtually 100 percent is occupied by Orientals in that building now. Most of them do have grown children living in the Bay Area. Every weekend, several children usually come by to visit with their senior parents, to take them out to lunch or dinner, or just to check up on them. They are out there fighting along with all the shoppers who come in on the weekend.

"The last item that we do not know how many spaces are lost -- right across the street from the proposed site is the Department of Public Health building that originally was built as a neighborhood clinic, a walk-in clinic. In the last couple years, there's been a budget cutback, and the clinic now is acting as more of an administrative office, resulting, I think, in more office workers there. I think, with more office workers, you can expect a reasonable percentage of them would be driving and also looking for parking spaces around that area there.

"And a few, apparently -- if you take a look at p. 42 on the EIR report. . . . That can be seen clearly on the lower right-hand corner. You can see the two cars parked there. One car is halfway into a traffic lane and the other car is right in front of it. They are both in the red zone.

"On the next page, you see where the proposed site is. You can see about four cars parked there. That is also a traffic lane. You know, people have no choice except to park there. If they are typical like me, they can expect several tickets every month. That is part of the cost of living there.

"And in the last picture, because the Department of Public Health has increased the staff so much, on p. 44, you can see right on the side of the Department of Public Health there, in the lower right-hand side there, that's a traffic lane right by the side of the Department of Public Health. You can see -- I don't know how many cars are parked there, but there is a sign there specifically prohibiting parking. Yet mostly, I would say, it would be Department of Public Health workers parking there because there is no parking space.

"I am sure in front of this proposed project will become a yellow, white, or a blue zone resulting in another three or four lost parking spaces.

"After the last ten years, over 110 parking spaces on the street have been lost to the residents." (Calvin Li)

"And being a property owner, I can tell you that, like the other guy said before me, the parking is practically nil. It's hard for anybody to get around there in Chinatown. You could ask the police department. I'm sure they will verify it." (Benson Lau)

"The project does not address, either, parking for visitors to the elderly and handicapped in the building." (Vesta Kirby)

"More importantly, a study should be made of the actual parking needs imposed by the senior center (for vans delivering meals, the 7-10 staff members, and the 150 visitors), in order to evaluate whether additional parking for the center should be required as a mitigation measure in light of the neighborhood's acute shortage of parking, or as a requirement of conditional use approval for placing a senior center at this location at all. The EIR should be revised to reflect the fact that a major community center is being proposed here, one which would require 19-25 parking spaces if it were only 6% larger in area.

"No parking is contemplated for those who come to visit the 69 elderly residents of the project, nor has any study of such parking needs been undertaken. Those of us in the Chinese community take seriously the obligation of visiting our elders on a frequent basis; on weekends especially, it is common knowledge that downtown Chinatown is flooded with cars bringing families to visit their parents and grandparents. Such visits fall most heavily on weekends and during the evenings, when the neighborhood's parking shortage is at its worst due to numerous other factors, such as commuters returning home, parishioners coming to Mass at Guadalupe, and overflow from the Broadway and Chinatown restaurant, entertainment and shopping areas. To aggravate matters, on Sundays and during the evening the residential sticker program restricting nonresidents to two hours' of parking is not in effect.

"The draft EIR must be amended to deal fully with the serious impact of visitor parking, in addition to senior center parking. Those of use who live in the neighborhood find it hard to understand how the draft EIR can so seriously understate these potential impacts imposed by the project.

"At a minimum, we ask that a serious, independent study be conducted of neighborhood parking shortages; that an analysis be made of how many visitors are likely to visit the residents of the project, and how and when." (Rose Chin, BTPC)

"Let's talk about parking. There is concern about parking. I think it's common knowledge that the Mayor, with the authority of the Parking Authority, has been, for quite a number of years now, negotiating for the purchase and construction of a seven-story parking garage on the Churchill Avenue site -- this is right across from the central police station. That will provide substantial parking for the area. Both Chinatown and the North

Beach area are designated special parking areas that have hour limitations specifically to discourage downtown parkers from taking up parking spaces." (Jennie Lew)

"The provision of 12 parking spaces is clearly inadequate and would result in serious operational difficulties. The report understates these negative impacts and does not offer convincing mitigation measures."

"Mitigation Measures - The 12 on-site parking spaces are for residents, staff, visitors and storage and circulation for trash removal. For 70 units of housing with community facilities, 12 spaces are clearly not enough. The mitigation of traffic impacts for the proposed project depends on these 12 spaces and nothing else. The report seems to suggest that the main mitigating measures are needed for the short term, during construction. This portion of the report is very limited in its scope, observations and recommendations." (Ann Ludwig, RHN)

"Show me a well maintained public housing that is TOTALLY occupied (what about the Turk Street project?) show me an answer to the CURRENT parking problem, that the density problem is fully understood." (Albert Schlesinger)

"Turning . . . to parking, the sponsor proposes as a mitigation measure the rather commonplace concession that staff members and visitors will be allowed to park in unused parking spaces reserved for residents. Moreover, the EIR states that the sponsor will consider requiring the contractor to provide off-site parking for its 30 construction workers, or asking DPW to approve a temporary curb cut for Alfred's parking access during construction.

"These measures clearly should be required without further discussion. They do nothing, however, to mitigate the serious parking problems stemming out of the senior community center (expected to attract 150 drop-in visitors and 7-10 staff members per day) or visitors coming to see the residents themselves. What is needed is a more substantial mitigation proposed, such as a plan to provide an extra 20-30 spaces for senior center, staff and visitor cars, or a plan to delete the senior community center from the project altogether, in order to reduce the demand for parking while simultaneously freeing up space for additional parking. We would like to see such mitigation measures required as part of the final EIR." (Rose Chin, BTPC)

"Page 68. As a transportation mitigation measure, the proposed on-site parking area should only be reserved for project residents and their guests, not project employees. This is because we believe that the area is well served by transit. As the Master Plan provides, the project's employees should be encouraged to utilize transit, rather than their personal automobiles, for their home to work trips, so as not exacerbate an already intolerable traffic situation." (Dan Wong, Muni)

Response

Comments are noted regarding the status of on-street parking in the project vicinity. The project analyzed in the EIR would include 12 parking spaces for use by project residents and their visitors; however, as discussed in the last mitigation measure on p. 68 of the EIR, "Visitors and staff could be allowed to use the spaces if it were found that the parking demand from project residents was insufficient to fill all the spaces." As indicated in the parking analysis on p. 52 of the EIR, there would be insufficient demand to fill the spaces from project residents. Also, as indicated on p. 52 employees would walk to the site from another center in the area. The revised mitigation measure below would help prevent visitors from abusing parking privileges at the proposed project.

The last mitigation measure on p. 68 of the EIR is revised to read (new language is underlined):

- Parking spaces in the project would be for use by project residents. Visitors of project residents and to the senior center (such as visiting health workers, meal delivery vans, etc.) could be allowed to use the spaces if it were found that the parking demand from project residents was insufficient to fill all the spaces. Building management would ensure that parking spaces in the project are not used for all-day commuter parking by visitors or staff of the senior center, or by staff of the Self Help for the Elderly programs.

The City Planning Commission in its action to approve, approve with conditions or disapprove the proposed project, would determine the adequacy of the mitigation measures proposed in this EIR.

No neighborhood parking availability studies were performed for this EIR because there is no question that parking conditions are poor in the area surrounding the site. The Chinatown neighborhood was included in the Neighborhood Parking Plan prepared in 1986 by the City. The following is added to the end of the Transportation Setting section on p. 32 of the EIR:

> The Chinatown neighborhood was included in a parking study conducted by the Department of City Planning as part of a Neighborhood Parking Plan for several neighborhoods in the City and is identified as the second worst neighborhood in the City in terms of parking conditions./2/ The area surveyed was roughly bounded by Broadway, Columbus, Montgomery, Sacramento, Grant, Washington and Powell Sts. This area is within one block of the site to the east, but parking conditions would be similar to those surrounding the site. The report describes parking in Chinatown as follows, "Parking conditions in Chinatown were found to be extremely poor, with the predominant problem being a pervasive shortage of spaces. Legal on-street supply was occupied at barely under 100 percent. Parking in white and red zones, double-parking and parking across driveways accounts for 18 percent of all on-street parking."

Additional problems for the Chinatown area noted in the report include excessive overtime parking in both metered and unmetered spaces and also in loading spaces.

The following footnote is added at the end of the Transportation Setting Section on p. 32 of the EIR:

> /2/ San Francisco Department of City Planning, Neighborhood Parking Plan 1986 - 1990, published April 1986.

A survey was conducted to determine how visitors to the senior center and employees would get to the proposed facility (see p. 51 of the EIR). This facility is not considered a major community center. See response to related comment on the interpretation of the City Planning Code parking requirement on p. 40 of this document. The following is added after the first paragraph of the "Parking" subsection on p. 52 of the EIR.

> Users of the senior center and employees would not increase parking demand as almost all trips would be made by walking or by transit./5/ Assuming one out of every four apartment units has a visitor who has driven to the area on a given day or evening, visitors to project residents would increase parking demand in

> the area by an estimated 18 vehicles. This would most likely occur on weekends and in the evenings when the area-wide demand for parking is at its peak. Visitor parking would be allowed in the project's garage if spaces are not needed by project residents; this would help to minimize the increase in parking demand from the project.

A new alternative (Alternative E) has been added to the EIR which would not contain a senior dining center (see p. 232 of this document). Under Alternative E, total trips to the project would be less, and loading trips would be almost eliminated compared to the project, due to elimination of the senior dining center. Parking effects would be essentially the same under Alternative E as with the project, because the number of residential units would be the same.

A new alternative has been added to the EIR as Alternative F; it is the sponsor's preferred alternative (see p. 235 of this document). This alternative would contain 14 parking spaces. This is the number of spaces required by the City Planning Code; no parking variance would be required. This alternative would have lesser effects than the proposed project on area parking problems since it would provide more spaces on-site.

The project sponsor does not anticipate a need for an on-street passenger or freight-loading zone. Vans would load and unload from parking spaces in the garage, temporarily blocking two or three spaces. If all spaces were occupied, vans would load and unload in the plaza driveway and would remain there only for a short time.

The Preferred Alternative (see p. 235 of this document) now includes 14 parking spaces; one of these would be reserved for use by a handicapped driver. Under Title 24 of the California Administrative Code, one parking space reserved for use by a handicapped driver would be required for the project.

As noted on p. 52 (Notes), the survey (under the direction of Environmental Science Associates) was conducted at four similar low-income senior housing developments in the Chinatown area. Residents of the proposed project would also be low income seniors and the physically handicapped. Residents would not be expected to use all the 12 parking spaces provided. Thus, there would most likely be parking spaces available for visitors and staff.

The City of San Francisco is currently negotiating a ground lease for a lot on Churchill St. and plans to construct a parking garage which will provide a net increase of 190 spaces on that site. This proposed facility is located two blocks from the site and would increase the off-street parking in the area./1/

NOTE - Churchill St. Garage

/1/ Harry Quinn, Senior Right-of-Way Analyst, San Francisco Real Estate Division, telephone conversation, March 2, 1987.

NOISE

CONSTRUCTION NOISE

Comments

"Page 70. Who determines whether the proposed project construction meets the City's Noise Ordinance?"

"Page 70. In the event that the City Noise Ordinance is exceeded, what measures will the project sponsor take to abate the noise, even after mitigation measures for noise discussed on p. 90 are taken?" (Melinda Pon)

Response

The Noise Ordinance (City of San Francisco, 274-72, "Regulation of Noise," Section 2907, adopted August 10, 1973) requires that all powered construction equipment, except impact tools and equipment, not emit more than 80 dBA, measured at 100 feet. Impact tools and equipment must have both intake and exhaust muffled to the satisfaction of the Director of Public Works. Thus, the Director of Public Works would determine whether the proposed project construction meets the above requirements and would institute additional mitigation measures if, after implementation of standard mitigation measures, excessive construction noise is still being generated.

Comment

"The EIR authors should more carefully study the weekday schedule of Masses and other Church activities in order to plan construction activities in such a way as to minimize disruption of Church activities. In addition, no mention is made of the childcare facilities located adjacent to the site and what mitigation measures, if any, will be taken to reduce the effect of construction noise on such facilities." (Rose Chin, BTPC)

Response

The weekday schedule of Masses (7:30 a.m. every weekday) provided the basis for the mitigation measure that restricts construction to 9:00 a.m. to 6:00 p.m., Monday through Friday, except on holy days when construction activities would be suspended from 11:30 a.m. until 1:30 p.m. to avoid noise impacts during the noon Mass.

This mitigation measure not only accommodates that Mass itself which lasts about one hour but also takes into account the half-hour of socializing by Church members outside of the Church after the morning Mass. The commenter does not specify what Church activities (other than Masses) could be disrupted by construction noise.

Although no mitigation measures are proposed specifically for the childcare facility located adjacent to the Church, construction noise effects on the childcare facility and on residences would be reduced through compliance with the City's Noise Ordinance and through the mitigation measures specified on p. 70 of the EIR.

CONSTRUCTION VIBRATION

Comment

"We understand that this construction could damage the frescoes that our great-uncle Luigi Brusatori painted in Our Lady of Guadalupe Catholic church in the early 1920's. These frescoes are not only an important part of our family heritage but also of Italian Catholic churches such as Our Lady of Guadalupe and Street Francis of Assisi in the North Beach area of San Francisco.

"We do not believe that any cracks or other damage that may be done to the frescoes can be effectively mitigated by the builder or repaired to both our satisfaction and that of the parishioners of Our Lady of Guadalupe". (Gina Brusatori)

"The effects of increased . . . noise and possible physical damage to the Guadalupe Church are discussed but not adequately addressed. Here again, mitigating measures are not fully developed and are to be applied only after the start of construction." (Ann Ludwig, RHN)

"The six story building which has been proposed near Our Lady of Guadalupe Church will, if constructed in the manner described, surely cause some damage to the church. According to expert testimony, the interior walls of the church are extremely likely to crack. This in turn will cause severe and irreparable damage to most of the outstanding frescoes painted on these walls. These marvelous paintings have remained intact for seventy years.

"Over this period of time, literally hundreds of thousands of people in San Francisco have viewed these works of art, painted in the year 1916 by my late uncle, Luigi Brusatori. It would be disastrous, through indifference, to destroy or damage these exceptional works of art. They are a part of the history of the City, and also deserve to be preserved as a reminder of an earlier time when such works of art flourished in our churches. I plead with you to consider the preservation of these frescoes, as they can never be replaced. Sometimes, in the name of "progress," we inadvertently destroy or damage something which has the quality to bring joy and wonder to the hearts of many people." (Richard Brusatori)

"Page 56. The project sponsor should also consider the vibrational impacts upon the adjacent buildings, not only the church. Copies of the vibration testing studies should be made available to concerned parties such as the neighbors and the church.

"The project sponsor should also consider the vibrational impacts upon the adjacent buildings, not only the church. But how about the neighboring facilities, and houses and condominiums up on Taylor Street? Copies of the vibration testing studies should be made available to concerned parties such as the neighbors and the church, and this should be done before the project is allowed to go ahead." (Melinda Pon)

"My comments are directed to a feature or factor which was perhaps inadvertently omitted or at least insufficiently addressed in your Environmental Impact Report.

"I am referring to p. A-30 of the report. And I will quote it in part. Could the project disrupt or adversely affect a prehistoric or historical archaeological site or a property of historic or cultural significance to a community, ethnic or social group. Which is answered no.

"The proposal to build a six-story apartment complex above the mouth of the Broadway Tunnel in San Francisco to house the elderly and the disabled threatens some magnificent frescoes which were painted in 1916 by artist Luigi Brusatori in the historic Our Lady of Guadalupe Church at 908 Broadway.

"The proposed building will be about 25 to 30 feet from the front of the church, and construction, such as vibrations from digging and placement of foundations and vibrations from other structural components that will be required, will crack the walls of the church on which these murals depicting religious scenes are painted.

"The frescoes decorate both the ceilings and the walls. They are of excellent quality and are irreplaceable. The perspective and composition are an outstanding work of art and they are also closely aligned with the history of the Catholic Church in San Francisco and in California.

"The artist was commissioned between the years of 1912 and 1921 to paint frescoes, commissioned by the Bishop of Monterey in Los Angeles, who was the Bishop for this whole area, to paint frescoes and murals in many of the churches in Northern California. These are among the few that remain to this day.

"This church, of course, dates from the 1870's and survived the 1906 earthquake, but was damaged by the fire. Our Lady of Guadalupe Church was one of the ones from which the Street Peter and Paul Church of San Francisco was established, for which the one hundreth anniversary was recently celebrated.

"While we recognize the need for housing for the elderly and the disabled and the handicapped, for which a federal grant is available, we believe it's unconscionable to ruin or destroy the irreplaceable murals at Our Lady of Guadalupe Church.

"With the use of your good judgment, such an adverse impact, environmental impact could be avoided. An alternative site for the housing could be found.

"As decendants of the family of the artist, Luigi Brusatori, and as members of the Italian-American community in San Francisco . . . we believe his work should be safeguarded from a seemingly well-intentioned -- but a plan which could ravage these works of art with the construction of housing. These works are so intimately intertwined with the development of this historic church and the history of California.

"I would also recommend, that you have the works evaluated by a qualified art historian. An inconsiderate or callous approach to safeguarding valued works of art would seem foolish when reasonably, an alternative site could be found for an otherwise worthwhile housing project.

"I did bring some amateur photographs of some of the art, just to give you some idea. But I would rather distribute an article which was written in a local paper recently to some of the members of the Commission which you might peruse and share with the other members." [Attachment C, p. 87 of this document] (Eugene Brusatori)

"We don't feel it's appropriate to assess these impacts [noise and vibration] after the project is commenced. More study, we would like to see on this area." (Ann Ludwig, RHN)

Response

Even without an evaluation by a qualified art historian, the City and project sponsor recognize the value of the frescoes painted on the interior walls of Our Lady of Guadalupe Church and the importance of safeguarding them from damage. Thus, the project sponsor has agreed to conduct pre-construction testing that would simulate the vibration that would occur during construction due to the operation of impact tools to determine the effect of such vibration on the frescoes. Because the Church is the closest building to the site, any vibration that would occur during construction would occur to a lesser extent on other buildings adjacent to the site. Thus the testing would monitor 'worst case' conditions in the site vicinity. Transmission of vibration would be monitored through the use of seismic monitors set up inside the

San Francisco's Unknown Artist

by Sister Carol Anne O'Marie

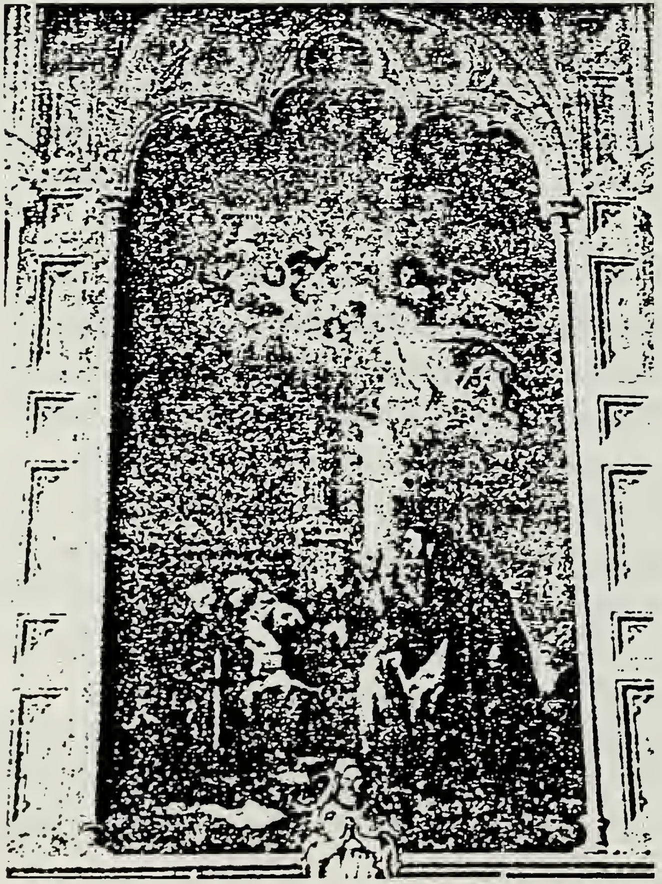
Earlier this year, letters began to trickle into San Francisco from Giuseppe Travanelli, director of the cultural center of Lonate Pozzolo, a small town northeast of Milan, Italy. The town, wrote Travanelli, was honoring the 100th birthday of one of its leading citizens, fresco painter and muralist, Luigi Brusatori. Brusatori was born in Santo Antonio, a village on the outskirts of Lonate, and he died there in 1942. Why, then, was the director writing to San Francisco?

The answer, it turns out, is that many Californians are familiar with Brusatori's work, yet don't know it. The muralist lived and worked here from 1912 to 1921, and his works remain in two archdiocesan churches and other buildings.

Brusatori's brother, Ambrose, also lived in the Bay Area, as well as a number of cousins. It was one of Ambrose's sons, Richard, who became interested in his artist uncle.

"I had heard my father talk about him since I was a kid," says Richard, "and about the churches he painted while he was here."

Carol Brusatori Gamble, a double second-cousin, remembers the artist when he lived in San Francisco. "I was only a child of 11 or 12 when he left, but I remember he was a dapper little man with a goatee," she says.



Photos courtesy of Richard Brusatori

This Brusatori mural, depicting the death of St. Francis, is one of two of the artist's works remaining in St. Francis of Assisi Church in San Francisco.

One of the best examples of Luigi Brusatori's work is in Our Lady of Guadalupe Church located over the Broadway Tunnel in San Francisco. Virtually the entire church is covered with his paintings, including the ceiling. "They say that the faces of the angels were modeled after members of the children's choir," says his nephew.

After finishing Our Lady of Guadalupe, Brusatori painted St. Francis of Assisi Church on Vallejo Street in San Francisco. Although many of his works have since been painted over, two remain, one on either side of the altar. One scene depicts St. Francis receiving the stigmata, the other is of the saint's death.

Brusatori's fame spread quickly and he was called on to paint not only churches, but other buildings as well. At one time, his works could be found in the old Palace Cafe on Ellis Street, a theatre in Watsonville, and a mausoleum in San Pablo, as well as Sacred Heart Church in Red Bluff and St. John Baptist in Fresno. What many considered his greatest work was in Santa Clara Church in Oxnard. Unfortunately, it was covered over after a fire damaged the church in 1972.

After studying his uncle's work, Richard Brusatori wanted to find out more about him as a person. Before Ambrose died, Richard was able to record many of the anecdotes his father told him in a charming oral history which he entitled, "San Francisco's Unknown Artist."

He learned that Luigi Brusatori was the tenth of eleven children and Ambrose was the eleventh. Their parents, Savina and Santino, were both named Brusatori although they were not related. Santino, a shoemaker, was also the village dentist and doctor. Luigi grew up in this small village, where he received three years of formal education.

As a youngster he began to sketch. When he was 15, he went to the neighboring town of Busto Arsizie to work as a hod-carrier. While working on a church in the town, he became fascinated with a group of artists painting frescos inside the church. He felt inspired by the artists and managed to master enough education to qualify for Reggia Academy of the Beautiful Art in Milan.

In 1902, at the age of 17, Luigi Brusatori painted his first fresco in the church of San Marcario near Milan. From that day until his death 40 years later, he never felt his work was complete until the parish priest had blessed it.

At 23, Luigi married Ida Castellana. Within three years their three children, Biagio, Beatricia and Tiberio, were born. The young artist found himself with a growing family and little means of support. In Italy, artists were often paid on the barter system or not at all.

Luigi's big desire was to build a home for his family. It was this goal that led him to look for work in the United States. For the next nine years, he sent money back to his family. At that time, 100 American dollars was enough to support his family in Italy for six months.

When Luigi Brusatori had been here for eight years, Bishop John Cantwell, newly appointed Bishop of Monterey-Los Angeles, commissioned Brusatori to paint his official portrait. Bishop Cantwell was so pleased he paid the artist $400 and recommended him as the muralist for Santa Clara Church in Oxnard. For six months, Luigi worked tirelessly on the church's interior. He was paid $5000 for his labor–equivalent to 10 years' wages.

With this windfall, Brusatori was able to return to Italy and build his dream house. For the rest of his life he remained in Santo Antonio where he continued to create beauty.

"My uncle may not be rated as one of the truly great painters," says Richard Brusatori, "but I think his work is excellent." The cultural center committee of Lonate agrees. "We intend to commemorate this master muralist's birth in a fitting manner," Travanelli, the director, writes. "We trust that you who share our cultural pride will, too." ☐

ATTACHMENT C

Church. If any effect on the frescoes is observed during pre-construction testing, the project sponsor would undertake a study to identify measures that would reduce the amount of vibration transmitted to the Church facade. In the event that a construction activity appears to be causing an adverse effect on the Church facade or frescoes during construction, construction activity causing the adverse effect would cease immediately and a structural or civil engineer would be brought in to determine whether or not there was a substantial adverse effect. Vibration from construction would have no other potential effect on other nearby structures.

The following is added as a new mitigation measure on p. 70a of the EIR:

> During the construction period, in the event that a construction activity reasonably appears to be causing an adverse effect on the frescoes or facade of Our Lady of Guadalupe Church, construction activity would cease immediately and a licensed structural or civil engineer (not associated with any firm having contracts related to project construction) would be hired by the project sponsor to determine whether or not there was a substantial adverse effect.

As stated in the last paragraph (mitigation measure) on p. 70 of the EIR, the project sponsor would require the general contractor to test for vibrations at the Church facade before construction actually begins. That testing would determine the need for further study of construction-generated testing. The project sponsor would undertake these studies to identify measures to protect the frescoes; thus, the purpose of these mitigation measures is to ensure as much as possible that the frescoes and facade of the Church would not be damaged during construction activities. The commenter did not state the source of the 'expert testimony' regarding the likelihood of damage to the frescoes resulting from construction; therefore, such testimony cannot be verified. Copies of the results from the vibration testing would be made available to concerned groups and individuals. The following is added at the end of the last paragraph on p. 70:

> The results of the vibration testing would be submitted to the Archdiocese of San Francisco, the Landmarks Preservation Advisory Board, the project sponsor, and would be on file and available for public review at the Department of City Planning, 450 McAllister St., San Francisco.

OPERATIONAL NOISE

Comment

"Page 70. What are HUD's requirements for noise levels in its financially sponsored projects? Are these noise level criteria achievable in light of the already ambient noise levels at Broadway and Mason Streets?" (Melinda Pon)

Response

Housing financed by the Department of Housing and Urban Development (HUD) must conform with Departmental Circular 1390.2, "Noise Abatement and Control." The average noise levels that were measured in front of Health Center No. 4 and that are discussed in the EIR on p. 53 cannot be directly related to HUD exterior noise criteria. HUD criteria defines "normally acceptable" exterior noise environments as those where noise levels do not exceed 65 dBA more than eight-hours per 24 hours. "Average noise levels," are sound energy averages over a given period of time while HUD noise criteria characterize noise environments in terms of the amount of time that a given noise level is exceeded. It appears that the existing exterior noise environment may exceed HUD 'normally acceptable' criteria, and thus, as a mitigation measure (see p. 70 of the EIR), the project sponsor would retain an acoustical consultant who would recommend appropriate measures to reduce noise levels in the building's front plaza to levels which are acceptable to HUD. It is not known, however, if noise at the plaza from cable car operations could be reduced to levels acceptable to HUD. Therefore, the following is inserted at the end of the second sentence of the third paragraph (mitigation measure) on p. 70 of the EIR:

> . . . or obtain a waiver from HUD of the exterior noise criteria, due to cable car operations.

HUD interior noise criteria define acceptable interior noise levels as those where noise levels do not exceed 65 dBA for more than 60 minutes in any 24-hour period, do not exceed 45 dBA for more than 30 minutes during night-time sleeping hours, and do not exceed 45 dBA for more than eight hours per 24 hours. Ambient noise levels at the project site would decrease due to closing the air space over the Broadway Tunnel.

The project sponsor would also abide by Title 24 (previously Title 25) California Noise Insulation Standards which require new dwellings (other than detached single-family dwellings) to be designed such that average noise levels do not exceed 45 dBA in any habitable rooms with all doors and windows closed.

Comment

"There is also an effect of noise pollution. If anyone in here lives near the neighborhood, they will understand that Friday and Saturday evenings anywhere from 9:00 o'clock to 2:00 a.m. or past, there is a constant honking of horns in that tunnel. These will go on for an hour or two. The police don't seem to stop it." (Dennis Hearn)

Response

The commenter notes that noise levels in the project site vicinity increase on Friday and Saturday evenings due to noise generated by cars inside the tunnel. With the project sealing the air space between the east ventilation building and Mason Street, noise generated inside the tunnel would be less noticeable at the site than with the air space open.

Comment

The report lacks analysis of noise and vibration transmission from tunnel traffic into the structure of the proposed project. Expensive technical solutions for the isolation of noise and vibrations could affect the cost of the development." (Ann Ludwig, RHN)

Response

The residents of the project would be protected from excessive noise levels through compliance with California Noise Insulation Standards and HUD noise criteria. Living and sleeping quarters for project residents would be on the second floor and above, therefore, any noise and vibration from the tunnel would be further reduced by intervening stories of the building.

AIR QUALITY

SAMPLING

Comments

"Page 59. One time sampling for a four-hour period hardly constitutes sound, scientific measurements of carbon monoxide. Data should be required to determine the air quality in and around the Broadway Tunnel during periods/seasons of the year, including periods of our 'Indian Summer' when air becomes stagnant in the Bay Area.

"Page 62. How can five measurements of carbon monoxide statistically qualify the Broadway Tunnel area to be same as BAAQMD's 23rd Street Station on Potrero Hill? This correlation has not been substantiated statistically and should not be made.

"Page 71. The proper sampling scheme should entail a carbon monoxide monitoring program over a one-year period, not just for a period of 45 days. Seasonal variations due to atmospheric conditions may affect the levels of carbon monoxide in and around the tunnel. The EIR should stipulate a more thorough carbon monoxide monitoring program.

"Page 59 discussed one time sampling for a four-hour period to constitute what is an environmental impact evaluation of the tunnel. I hardly think a four-hour sample constitutes a sound scientific measurement of carbon monoxide. I believe the Planning Commission should require that air quality in and around the Broadway Tunnel during periods and seasons throughout the year be studied before this project goes ahead." (Melinda Pon)

"Because the housing would cover an existing opening in the top of the tunnel, the Draft EIR addresses the project's potential to affect carbon monoxide (CO) concentrations in the vicinity of the tunnel. As the Draft EIR indicates, the BAAQMD sampled CO concentrations in and around the tunnel to provide an indication of existing CO conditions. The measurements were taken on one winter evening (January 24, 1986) under generally average winter meteorological conditions.

"The CO levels recorded near the tunnel did not differ significantly from CO levels monitored at the BAAQMD's Potrero station on the same evening. The Potrero CO levels were moderate; higher measurements were recorded on other evenings during the same winter. We expect that the January 24th measurements near the tunnel also captured moderate CO levels, not worst-case levels.

"The Draft EIR concludes that 'future CO levels north and south of the tunnel's easterly end could increase to about 4 ppm and 8 ppm from the existing 2 ppm and 6 ppm, respectively with the project and under similar meteorological and traffic conditions as those that were present during CO measurements. The increased CO levels would still be below the State CO standard of 20 ppm, one-hour average.'

"This conclusion is based on average conditions, not worst-case conditions. As indicated above and in the Draft EIR, the CO measurements near the tunnel on January 24 were comparable to measurements at the District's Potrero station during the same evening; the Potrero readings were moderate. We suggest that the air quality analysis should use the comparability of the tunnel data and the Potrero measurements to identify worst-case CO levels in the future with the project. Based on Potrero data, worst-case one-hour background levels would be about 10 ppm. We also suggest that the air quality analysis in the Final EIR include an estimate of future eight-hour CO concentrations. Based on Potrero data, worst-case eight-hour background levels would be about 7 ppm." (Milton Feldstein, BAAQMD)

Response

As indicated in the comment above, the Bay Area Air Quality Management District (BAAQMD) considers that CO levels near the Broadway Tunnel do not differ significantly from CO levels monitored at BAAQMD's Potrero Hill air quality station (see the EIR, p. 62, and the second comment above). On the basis of this conclusion, BAAQMD recommends using Potrero monitoring data to determine worst-case CO levels in the future with the project. Furthermore, based on Potrero data, BAAQMD recommends using a worst-case, one-hour average, background level of 10 ppm and a worst-case, eight-hour average, background level of 7 ppm.

The Draft EIR assesses potential air quality impacts based on CO measurements corresponding to stagnant atmospheric conditions most often associated with winter, and worst-case traffic conditions (not including accident situations) associated with Friday evenings.

The second comment notes that atmospheric and traffic conditions on January 24th, 1986 (the date of Broadway Tunnel CO measurements), produced moderate CO levels at the Potrero station, not worst-case levels. For a worst-case air quality analysis, that BAAQMD recommends using worst-case background levels as recorded at the Potrero station.

The measurements taken inside the tunnel reveal instantaneous CO levels ranging from 9 ppm to 18 ppm. The background level recorded at the Potrero Station during the evening of January 24th, 1986 was 4 ppm. Subtracting 4 ppm from the CO levels recorded inside the tunnel identifies the tunnel increment, in this case, ranging from 5 ppm to 14 ppm. The tunnel increment is produced by motor vehicle traffic emitting CO in the confined space of the tunnel. The last three sentences of the first full paragraph on p. 63 of the EIR are deleted, and the following is inserted after the first full paragraph on p. 63 of the EIR:

> Given a worst-case, one-hour average, background level of 10 ppm/8a/, worst-case instantaneous readings inside the tunnel would range from 15 ppm to 24 ppm. On the assumption that the one-hour average CO levels inside the tunnel would be a value within the range projected for instantaneous readings, the worst-case, one-hour average, inside the tunnel would be between 15 ppm and 24 ppm. The project, at worst, has been estimated to increase CO levels east of the tunnel's east portal by 15%, based on a City engineer's estimate of 10% to 15% diffusion through the existing air space. Thus, worst-case, one-hour average CO levels inside the tunnel would increase to a range of 16 ppm to 26 ppm as a result of the project. (Background level is still 10 ppm, and the tunnel increment is estimated at 15% greater than the existing tunnel increment.) The BAAQMD engineer who took the instantaneous readings observed that the high values within the range of CO levels were caused by older, more polluting vehicles as they passed the CO monitor. The one-hour average CO level would probably be closer to the low end of the range of recorded CO levels with the project, because the peak readings indicate the instantaneous effects of CO levels of trucks and older or more polluting motor vehicles (see p. 62); thus, the worst-case one-hour average CO level inside the tunnel would probably be below the state one-hour average CO standard, 20 ppm. Nearby sensitive receptors would not be exposed to this level, however, since tunnel emissions are dispersed upon exiting east of Health Center No. 4. The CO measurements illustrated in Figure 16 indicate that dispersion of tunnel emissions (due primarily to movement of air by vehicle

movement and connection currents) east of Health Center No. 4 is fairly rapid. The CO measurement at Wayne Place which is just south and east of Health Center No. 4 was about two-thirds of the lowest CO reading taken inside the tunnel. CO readings taken at the Jean Parker Elementary School and the intersection of Powell Street and Broadway were less than one-fourth the lowest CO reading taken in the tunnel.

Although the precise fluctuation of CO levels inside the tunnel over an eight-hour period is not known, it is probable that under worst-case conditions when background levels are about 7 ppm,/8a/ eight-hour average, CO levels inside the tunnel would exceed 9 ppm, which is the ambient CO standard for eight-hour exposure to CO. However, no one remains in the tunnel for an eight-hour period, to be affected by an occasional exceedance that might occur under worst-case conditions, other than tunnel operators who work inside the ventilation buildings. Air quality standards for the work place (in this case, for tunnel operators) are generally higher than ambient standards. For carbon monoxide, the Threshold Limit Value listed by the American Conference of Governmental Industrial Hygienists is 50 ppm, eight-hour average, which is several times the worst possible eight-hour average inside the tunnel./8b/ The worst-case analysis makes use of CO levels that correspond to the most stagnant atmospheric conditions. If no exceedence is estimated to occur under these conditions, there is no need for seasonal or year-long study when atmospheric conditions are less stagnant and CO levels would be necessarily lower. No sensitive receptors outside the tunnel are exposed to an eight-hour average exceeding 9 ppm, due to tunnel emissions, even under worst-case conditions due to dispersion of tunnel emissions with outside air at the tunnel exit and due to shifting winds that occur over an eight-hour period which would distribute tunnel emissions over a wide area. This would also be true with the project. Also, unlike the worst-case one-hour CO levels estimate described above, it is probable that, over a worst-case eight-hour period, the ventilation fans would be in operation. Fans help to push emissions out of the tunnel and, in the process, effectively dilute those emissions reducing their concentration.

The following are inserted as footnotes 8a and 8b on p. 66 of the EIR:

/8a/ Milton Feldstein, Air Pollution Control Officer, Bay Area Air Quality Management District, letter, December 11, 1986.

/8b/ American Conference of Governmental Industrial Hygienists, Threshold Limit Value, and Biological Exposure Indices for 1985-86, 1985.

Comment

"In the August 15 Initial Study, you stipulated that the EIR must address whether any ambient air quality standard would be violated by the project or whether sensitive members of the public, such as school children, would be exposed to substantial pollutant concentrations.

"In spite of the potential seriousness of such environmental effects in a project covering a heavily used tunnel, the draft EIR bases its air quality assessment on merely one independent study: a sampling of CO concentrations at eight locations in and around the eastern tunnel opening on Friday, January 24, 1986, from 5 to 9 p.m. No samplings were performed during the peak traffic hours between 8 and 9 a.m.; no samplings were done at other times of the year, when atmospheric conditions might result in very different readings; no sampling was conducted during heavy traffic conditions when cars are bumper-to-bumper and virtually at a standstill in the tunnel. Moreover, no traffic count was performed during the one CO sampling cited; instead, the traffic conclusions (which appear to blur the distinction between the traffic volume and velocity) are based on a separate February 1984 report.

"On top of this flimsy data base, one of the most important conclusions in the EIR is simply an assumption. The draft EIR merely estimates (based on a phone conversation with a DPW engineer) that at low traffic volumes, only 10-15% of the tunnel's emissions diffuse upwards through the tunnel's roof, with the remainder exiting out the tunnel entrance on Lower Broadway. No study has been undertaken to support this estimate, nor do we have any information about how this diffusion rate might vary under different traffic or atmospheric conditions." (Rose Chin, BTPC)

Response

Between August 11, 1986 and October 31, 1986, the Department of Public Works took 264 CO samples in and near the Broadway tunnel (this information had not been compiled and analyzed by the time the Draft EIR was published on November 7, 1986). Three sampling locations were chosen for both eastbound and westbound lanes: at mid-tunnel, beneath the air space over which the project would be built, and beneath Health Center No. 4. These samples were taken on weekday mornings between 8:30 a.m. and 11:30 a.m. under various atmospheric conditions, ambient temperatures, traffic conditions, and ventilation air settings. The results show CO concentrations ranging from 2 ppm to 12 ppm, and the average instantaneous reading inside the tunnel to be about 8 ppm./1/

This recently-acquired data supports the conclusions of the EIR which were based on CO readings taken by the BAAQMD. In both instances, the measured CO levels did not exceed ambient air quality standards and the difference between the levels measured inside the tunnel and the levels measured beneath Health Center No. 4 were minor. This minor difference between levels measured beneath the Health Center and points in the tunnel supports the conclusion that an insignificant amount of air exiting the Tunnel diffuses through the existing airspace over which the project would be built.

CO ambient standards have been established for one-hour average and an eight-hour average. Although it is inexact to estimate one-hour average CO levels based on instantaneous readings, the large number of samples (264), none of which approached the one-hour average CO standard of 20 ppm, indicates that an exceedance is highly unlikely inside the tunnel, except under unusual circumstances such as in the event of an accident blocking both lanes in a tunnel bore, and drivers leaving their engines on.

The eight-hour CO standard (9 ppm) is probably exceeded under worst-case conditions when the background level is about 7 ppm, eight-hour average. No one would be exposed for an eight-hour period, however, except for tunnel operators (see previous response).

The results of CO monitoring by the Department of Public Works support the Department's original appraisal of the use of the air space to vent tunnel air. That is, a small fraction (maximum of 10% to 15%) of the air that exits east of the tunnel diffuses through the existing air space. The samples showed little difference between the CO levels measured at the different sampling locations. On average, the difference between the sample taken inside the tunnel and the sample taken underneath the Health Center (on a given day) was about 1 ppm. If a substantial amount of diffusion were occurring through the existing air space, a wider margin would have been expected. The range of atmospheric, temperature, and traffic conditions exhibited over the three-month autumn period during which sampling was conducted, together with the earlier-reported January measurements, provides representative CO levels for worst-case meteorology over the entire year./2/ See pp. 59 to 63 of the EIR for discussion of the January 24, 1986 CO monitoring.

NOTES - CO Sampling

/1/ Raymond Wong, Department of Public Works, telephone conversation, January 23, 1986.

/2/ D.P.W staff noted the ambient temperature, time, weather, and ventilation fan condition during each monitoring run.

VENTILATION

Comments

"[I]n reference to ventilation in the park, I know some studies were made, and they say that the weekend pollution of the tunnel is a lot less then during the week." (Dennis Hearn)

"The draft EIR does not adequately address any number of environmental issues such as the quality of air in the tunnel . . . " (Nielsen Rogers)

"[W]e consider any plan to construct a building (particularly housing) at the proposed site to be ill-conceived given the amount of traffic that passes through the Broadway Tunnel based on the accompanying noise, vibration and carbon monoxide pollution." (Gina Brusatori)

"[A]dditional fumes and lack of ventilation will occur." (Albert Schlesinger)

"This proposal makes a mockery of the EIR process in a very sensitive area of potential environment impact. In essence, the draft EIR makes no real effort to assess in advance the impact on air quality of covering the tunnel; instead we are asked to approve the project first, then the appropriate study and mitigation measures will be addressed." (Rose Chin, BTPC)

"Just in one year, there have been 45 major accidents reported to the police department in that tunnel and the approaches to it. This is a question of the people who are at the bottom of that hole -- most of them do not live in San Francisco. If they did, they wouldn't be coming through that tunnel. They live up north of the Golden Gate Bridge.

"Fifty years ago, when they planned the two great bridges, they neglected to make a link between what is now Highway 101 and Highway 80 between the Golden Gate Bridge and the Bay Bridge. That link is a tunnel, a hole in the ground.

"What is involved is sealing off that air space. The people who are breathing that air through that air space are in the position of a man who has his mouth taped up. He's still got two nostrils. The mouth is only a very small part of the body, but the mouth is important for breathing.

"The next observation that I would have is this article that is from . . . December 8, 1986, San Francisco Examiner. It mentions here that it has to be there.

"Tunnels are dangerous places. To seal off the top air space of the now open Broadway Street would be to take that air from the pedestrians and people in the cars in the tunnel below.

"In regard to why is it that Our Lady of Guadalupe Church is calling out about this danger, it is for the very simple reason that it is a dangerous place to put people in, in the hole at the mouth of the Broadway Tunnel, with 35,000 cars passing through the basement, with a 50-year life expectancy of a building that is bound to crack, to become unsealed, to expose the people to danger. It's a question not of just shadows on a building or of having an inconvenience of an alleyway, but of the lives of people who are involved, the lives and the health and the safety of the people passing through that tunnel." (Father McDonnell)

Response

The first commenters' reference regarding ventilation in the park is unclear. Traffic counts indicate that average daily vehicle trips through the tunnel are less for a weekend day than for a weekday, and that traffic on weekends is more evenly distributed over a 24-hour period. As cars are the primary source of carbon monoxide (CO) it is reasonable to expect that heavy traffic volumes (on weekday peak periods) will result in increased CO levels along streets (and through tunnels). For this reason, this report discusses CO levels monitored on a Friday evening when traffic volumes are typically at their highest for the week, to ensure a conservative baseline CO level for the project's impact assessment.

The second commenter does not specify in what way the EIR fails to adequately address the issue of air quality in the tunnel. On pp. 62-64, the EIR discusses measured air quality in the tunnel, and its significance to the proposed project.

With the project, the Broadway Tunnel would continue to be ventilated primarily by the action of motor vehicles pushing air into and out of the tunnel. The issue of recirculation of fumes is discussed on p. 65 of the EIR. The EIR concludes that the project would not have a significant impact on tunnel ventilation. This conclusion is based on information provided by the Department of Public Works regarding the amount of tunnel air diffused through the air space and on CO monitoring data provided by the BAAQMD.

The mitigation measure requiring further CO monitoring (pre-construction monitoring has been completed by the Department of Public Works, see previous response on pp. 180 to 182 of this document) does not imply that the air quality analysis in the EIR is inadequate. The conclusions of this section of the EIR were based on information provided by the Department of Public Works regarding the amount of tunnel air diffused through the air space and on CO monitoring data provided by the BAAQMD. CO monitoring is a commonly accepted scientific practice for verifying theoretically derived data with real data. Future CO monitoring by the Department of Public Works will provide a basis for verification of the conclusions of the EIR. CO monitoring, after sealing the air space, is proposed (see mitigation measure on p. 71 of the EIR). Such monitoring would document changes, if any, in CO levels due to the project and would provide the basis for determining the proper design of effective mitigation measures, as discussed on p. 71 of the EIR.

The EIR, on p. 62, states that the percentage of emissions that diffuse through the existing opening (of the total emissions that diffuse east of the tunnel) has been estimated at 10% to 15%. The remaining 85% to 90% diffuses into the atmosphere east of Health Center No. 4. Thus, with the project, CO levels east of the East Ventilation Building could be up to 10% to 15% higher than existing levels. On the basis of CO monitoring conducted by BAAQMD and Department of Public Works, a 10% to 15% increase would not generate CO levels that violate state or federal CO standards inside the tunnel. Since the levels inside the tunnel would be below standards, the sensitive receptors located near tunnel openings would also not be exposed to CO levels that violate the standards. However, in the event of recirculation of CO emissions, CO levels in the north bore could increase. This potential impact is discussed in the EIR on p. 65, and a mitigation measure is proposed as part of the project, as described above.

If cracks were to develop in the concrete slab of the building, it is unlikely that occupants of the proposed building would be exposed to tunnel fumes, as the slab of the structure would be sealed from its interior with an impermeable but flexible material designed to withstand vibration. Also all but two residential units would be separated by two floors from the building slab. The project's garage opening would provide additional means of ventilation of any fumes within the garage.

Comment

"I don't understand why originally the tunnel was made to have the hole on either end, and I don't think that was addressed in the EIR, is why it was there originally. I would assume it was there for some engineering reason." (Al Petrie)

Response

The air space, between the East Ventilation Building and the Mason Street Bridge, which would be entirely covered by the project is about 160 feet in length. The purpose of the air space immediately east of the tunnel was to minimize the time vehicles travelled in darkness. The space immediately east of the northern bore is covered with glass bricks which are designed to gradually change light levels in order to ease the visual contrast experienced by drivers entering the tunnel. The air space at both the east and west ends of the tunnel was left open to reduce costs of the tunnels construction./1/

NOTE - Tunnel Construction

/1/ Vijay Gupta, Section Engineer, Mechanical, Department of Public Works, telephone conversation, January 6, 1986.

Comment

"Page 51 and page 58. This section on Broadway Tunnel ventilation discusses the ventilation of the tunnel due to the movement of vehicles. However, what happens to the air movement when, on a worse case basis, the ventilation jams are not in operation and the traffic is at a standstill and/or a fire or explosion has occurred in the tunnel? Why has the EIR not addressed these conditions in its discussion about air quality?

"In the event of virtually no air renewal inside the tunnel, what effect would result with the fans running? Would the opening space, proposed to be sealed by the housing project, make a difference with the fan running?" (Melinda Pon)

"As far as carbon monoxide in tunnel, it is very bad at times due to accident or rush hours. There is always escape of carbon monoxide. But when there is a back up of traffic jams or any accident, it is very bad or a twist in the wind raises hell with the fans by sometimes getting jammed. As far as building, the Broadway Tunnel especially for the elderly who have many defect it is very bad.

"I worked for the City 23 years. I worked in the Broadway Tunnel 18 years. [I]n the Broadway Tunnel, when the different seasons came about, the fans couldn't deal with the pollution and the noise in that tunnel. I ought to know. I was in the second floor and I had to get out of the tunnel because of the pollution.

"People say, 'Oh, it's all right.' It's not all right at all. And to build any project for the elderly there with such pollution and such noise is a catastrophic thing to do.

"And I say again, not to build anything, because I know when the wind changed, when the weather changed, the fans were going at a tremendous speed, and I had to divert the traffic. I had to go down in the tunnel and divert the traffic when the fumes got so bad that the fans could not take the carbon monoxide." (Albert Pierce)

Response

The EIR states, on p. 64, that in the event of virtually no air renewal inside the tunnel, such as an accident blocking both lanes of traffic in one of the tunnel's bores, and cars keeping their motors running, emissions would accumulate resulting in high pollutant concentrations inside the tunnel. This is an existing potential hazard which would not change significantly with the project, because with virtually no air movement within the tunnel, virtually no emissions can diffuse through the tunnel ends or through the existing opening at the project site.

With the fans operating, there would be air movement inside the tunnel. In the event of stalled traffic inside the tunnel, with the fans producing air movement in the tunnel equivalent to the air movement produced by very light unrestricted traffic volumes, the air space diffuses about 10% to 15% of the air that diffuses east of the tunnel (see p. 62 of the EIR). CO levels east of the tunnel then would be 10% to 15% higher with the project than without the project. With or without the fans operating, stalled traffic conditions inside a tunnel bore cause high pollutant CO levels in the tunnel. With the project under these conditions, CO levels east of the tunnel would not be significantly higher than without the project.

Motor vehicles today generate far less carbon monoxide than in previous years as a result of implemented state and federal emissions standards for new motor vehicles and the biennial Vehicle Inspection and Maintenance program. BAAQMD composite emission factors for 1985 are less than one-third of those for 1975 for all vehicle speeds./1/ Composite emission factors for 1990 are projected to be about one-fourth of those for 1975./1/ Although daily traffic volumes through the Broadway tunnel are larger than in the past, the reduced emissions per motor vehicle have more than offset this increase. BAAQMD CO monitoring, discussed in the EIR, indicates that normal traffic conditions (not including an accident situation) do not generate hazardous CO levels inside the tunnel. An accident, stalling traffic in both lanes of a tunnel bore, would raise CO levels at the ends of the tunnel without the project, as well as with the project.

NOTE - CO Monitoring

/1/ BAAQMD composite emission factors are based on EMFAC6D developed by the California Air Resources Board and adapted to a Bay Area vehicle mix.

Comment

"I am president of the Malayun Housing Project, which was the HUD 236 project completed in 1982.

"We are a housing project that's built on a hill that has 185 units. We are also built above the Stockton Street tunnel. We have elderly living there and families. Over 300 people live above that tunnel. None of them have complained about headaches or smoke or noise or traffic from the Stockton Street Tunnel." (Cynthia Joe)

Response

Comment noted.

LEAD

Comment

"On the subject of lead emissions, which would seriously affect the children at Jean Parker School, located at the mouth of the tunnel, no studies have been performed at all. The draft EIR simply states that lead emission levels have never exceeded established norms in the City of San Francisco, based on readings collected regularly at a 23rd Street station.

"Basing conclusions on readings at 23rd Street ignores the fact that in the entire city there is probably no location more susceptible to high lead emission levels than the Broadway Tunnel, given the high volume of traffic moving through a confined tunnel and the numerous times that traffic is at a standstill. We are not reassured by the assertion in the EIR that lead emission levels are not important anyway because they will go down by 1990; a study should be performed now to determine the potential lead emission hazards to the children at Jean Parker School and other neighbors." (Rose Chin, BTPC)

"It has been documented in the EIR as to health effects of ambient lead levels. In order to protect the children attending school at Jean Parker and residing in adjacent homes to the Broadway Tunnel, I believe monitoring should be conducted until it can fully documented that there is no problem and the risk to impaired blood or nerve function in children is non-existent.

"Page 65. The mitigation measure for CO monitoring should include lead as well." (Melinda Pon)

Response

While it is acknowledged that lead concentrations near the tunnel's openings are higher than typical background levels, there is no reason to suspect that lead levels exceed 1.5 ug/m^3, 30-day average, which is the state standard for lead. Table E-1 of the EIR lists the highest 30-day average lead concentrations measured at BAAQMD's Potrero District station. The average of the highest monthly average for the years 1982-1985 is 0.5 ug/m^3 which is one-third of the standard. As with carbon monoxide, lead levels outside and near the ends of the tunnel would be substantially lower than those inside the tunnel; i.e., closer to those on open streets carrying heavy traffic.

Lead monitoring inside and in the vicinity of the tunnel is not considered to be necessary because of low background level recorded at BAAQMD's Potrero Station. The average highest monthly average lead concentration for the past four years is 0.5 ug/m3 (see Table E-1 of the EIR). There is no reason to expect lead levels in or near the tunnel to be three times this level, which would equal the state standard of 1.5 ug/m3.

With the project, lead levels east of Health Center No. 4 could be as much as 15% higher than existing levels and would not violate the standard. Because of low background levels which are about 33% of the standard during worst-case conditions and the continually decreasing number of motor vehicles which use regular (leaded) gasoline, no lead monitoring has been proposed for the tunnel or its vicinity.

INDOOR

Comment

"By completely sealing the tunnel and the project building from the emissions and noise, what mitigation measures will the project sponsors take to prevent the tight building syndrome affecting the disabled and respiratory - distressed occupants of this building? The tight building syndrome affects residents of hermetically sealed buildings -- that is, they're encapsulated to reduce the noise and air quality problems that will be evident in this project." (Melinda Pon)

"Once I met an old man. He was 105 years old. I asked him, 'My dear friend, how you able to live 105 years old?' He told me, 'Young Fellow, you must keep on breathing.'

"Now, everybody can read. Air pollution control. We all know that now modern buildings are shut in like prisons, submarines under the sea and a lot of other environments where do not have clean air.

"It has been not surprising long ago to go into an American toilet, the first thing you open the light, bang, you hear the wind blowing because there is no window.

"Now, do you want to put all the old people in a house to breathe all the carbon monoxide and put them in poison?" (Walter Limbach)

"I work as a research nurse. I work in two different job settings. And I am going to talk about the tight building syndrome.

"One setting where I work is a building where there is a natural ventilation and another where the windows are sealed and the building temperature is centrally controlled.

"This latter building, after my readings, I know they're called tight building, or supersealed buildings. Every time I work for eight hours in this supersealed building, I find myself during the work hours having difficulty with concentration, decrease in energy, somewhat spacey, and with occasional headaches.

"These feelings leave as soon as I get into an openly ventilated area. Such symptoms don't come up when I work in the naturally ventilated building.

"Because of this experience, I have read up in several literatures and have discovered that what I have is what the environmentalists call the tight building syndrome, which includes headache, eye and respiratory tract irritations, dizziness, lethargy, and inability to concentrate.

"In 1983, the National Institute of Occupational Safety and Health in an environmental conference discussed their studies on the tight building syndrome. They cited several examples, but I'm going to talk only about two.

"One is that in 1982, NIOSH discovered that 41 employees in a seventh floor office suite in a federal building complained of headaches, muscle pains, chest tightness, and nausea which persisted during weekdays and dissipated over the weekend.

"The other example is that of an elementary school outside of Washington, D.C. The occupants there had recurring microbial contamination for years. Teachers working in the building complained of unusually frequent health problems like pneumonia, upper respiratory infections, allergic rhinitis, allergic asthma, as well as hypersensitivity pneumonitis.

"Studies conducted by NIOSH have shown that air inside many sealed buildings is as much as 30 times more polluted with gases, cigarette smoke, and microbial flora as the air outside on a typical work day in many cities.

"Sealed building are health hazards. These are not only minor health problems, but major ones as well. The fatal Legionnaires Disease in 1976 is one example.

"Pathogens and pollutants from building inhabitants are not the only sources of human health hazards, but some of the more efficient and effective insulation and building materials now in use are suspected also of causing cancer.

"I think the Pineview Project is a worthy project, but they have to consider the fact that they're going to house the elderly in a sealed building. I think the EIR should have to consider the impact of the sealed building on the elderly inhabitants or the handicapped who are going to stay there.

"The Pineview Project will house the elderly and the handicapped in this building. This really will solve the housing problem temporarily. But what about the elderly and the care giver's health and quality of life? Surely these factors far outweigh the housing problem.

"The health risk of this proposed sealed building is so great that we have as responsible citizens, we have to consider that senior citizens who are very frail are very susceptible to respiratory and cardiovascular problems. We have to consider that we, too, will be possible inhabitants of those sealed buildings in the future." (Theresa Yap)

"If you are going to build Pineview with every window closed, I pity those poor elderly seniors.

"I have some notes here that I have taken from Preventive Medicine in Public Health, the 10th edition, also some notes from the Guide to Patient Evaluation of Seniors, Assessment of the Aged.

"The physiological changes in the seniors. They have a reduced vital capacity of the lungs. They have reduced pulmonary ventilation on exertion. They have lowered oxygen uptake during exercise. These are normal seniors. These are not the ones who are diseased. They have reduced cardiac output. They have reduced blood flow to the brain. They have reduced basal metabolic rates.

"Now, to put them in a building where there is a possibility that the air conditioning may break down -- and they're there 24 hours a day. Now, if anybody knows seniors, you know many of them are homebound. They may go out and do a little shopping.

"I have worked in senior buildings. My experience is that their big excursion is a weekly visit to the doctor. They are in the building almost constantly. You are talking about 24 hours a day.

"We who work in the health center are there -- I am there just probably because I am out in the districts. I am there maybe half a day. But the clerks are there, at the most, eight hours.

"Carbon monoxide, is produced whenever inorganic [sic] materials are burned in the absence of sufficient oxygen to transform all the carbon to carbon dioxide. Automobile exhaust gas -- contains five to ten percent or more of carbon monoxide.

"The mode of action, the essential effect of exposure to carbon monoxide is anoxia. The affinity of hemoglobin for carbon monoxide is 200 to 300 times greater than that for oxygen. Hence, when carbon monoxide is present in the air, hemoglobin combines more readily with the carbon monoxide and less is available for transportation of oxygen.

"Furthermore, carbon monoxide forms a more stable compound with hemoglobin than does oxygen and disassociates much more slowly then does oxyhemoglobin. Carbon monoxide is absorbed through the lungs. The rate of elimination of carbon monoxide is much slower than the uptake, but it can be hastened by breathing oxygen in place of air.

"The current interest in carbon monoxide is currently centered on its effect on mental performance and its influence on circulatory diseases, especially coronary vascular disease. The current interest is the associated risk with low carbon monoxide exposures -- this is low. There is acute exposure, but I'm not going to cover that. I am just going on the low chronic exposure which these people might be exposed to in this building -- it would be over a period of years and they may not see it right away, that the current interest is that these exposures in persons with coronary vascular diseases stems from some mortality studies and from theoretical calculations of oxygen supplied to the tissues with low levels of carbon monoxide.

"The theoretical calculations suggest that persons with decreased arterial pulmonary oxygen from chronic lung disease or high altitudes or with anemia or low blood flow and those who are pregnant might be placed under severe stress with carbon monoxide levels of nine percent [sic] or above.

"And to go to the cardiovascular, to the chronic respiratory infections -- carbon monoxide . . . It says persons with cardiovascular or respiratory diseases present a special problem since they already may have some degree of hypoxia from their disease.

"I'd like to address that. In my experience with seniors, almost all of them have cardiovascular disease. Very many of them have respiratory disease. I really feel these people will be at risk under [sic] the tunnel." (Sandra McNichol)

Response

The project would be constructed in accordance with all applicable local (City of San Francisco Unified Building Code, 1979), state and federal (HUD) codes for multi-family structures. The proposed project would have operable windows, as required by the City's Building Code for residential buildings. All dwelling units would have natural ventilation with operable windows. Therefore, occupants of the project would not be involuntarily subjected to 'tight building syndrome' and associated physical effects. (See also response on p. 185 of this document regarding exposure of building occupants to Tunnel fumes).

GROWTH INDUCEMENT

Comment

"Page 39. What justification is there for rezoning the site from RM-2 to RM-4? Would redesignation of the site encourage efforts to rezone other sites in this RM-2 use district to RM-4, residential mixed, high density? What is the long term impact of the rezoning of this site.

"If variances and conditional use authorizations of this nature . . . were granted . . . would not these actions set a precedent for high density residential housing not only in the North Beach-Broadway area, but over air spaces in the San Francisco area -- like, for example, the expressway on Geary Blvd." (Melinda Pon)

"The project would set a precedent for changing the zoning and density in this neighborhood. The door would be open for tripling the density on similarly zoned properties." (Ann Ludwig, RHN)

"Growth Inducement. The draft EIR comments in this section that rezoning the project could set a precedent for similar rezoning in other areas. This is a particularly serious impact, in that the project is located at Mason Street, which is elsewhere described as the boundary between the more densely built up commercial areas of Chinatown and the less densely built residential neighborhoods to the west. Just as Pineview's sponsor has cited prior nonconforming projects (such as Royal Towers and Ping Yuen) in justification of its request for rezoning, so will future projects be able to point to the Pineview project to justify building large projects in the neighborhood.

"In addition, the draft EIR is incorrect in implying that growth naturally will be discouraged by the limited availability of lots in the area. The dangerous precedent being set here is the construction of a building in the middle of a public right of way. Such rights-of-way abound in the adjacent neighborhoods, mainly as the result of hilly terrain cutting off streets and converting them into landscaped open areas; each of these public spaces potentially could be a candidate for future development if the Pineview precedent is set. Moreover, if the Pineview project is allowed to build six stories, many existing residential structures that currently provide affordable housing may be demolished as developers seek the higher returns possible from building six stories.

"The EIR should include a comprehensive survey of other public rights of way in the City that either have been built on by private developers or are threatened with development if this precedent is set." (Rose Chin, BTPC)

Response

This EIR does not "justify" the proposed rezoning of the project site; that is not a part of the environmental review process under CEQA and is not the function of an EIR, nor does the EIR refer to other buildings as "justification" of the proposed rezoning as stated in the comment. The two buildings mentioned by the commenter (Royal Towers and Ping Yuen) are discussed in the EIR only as part of a contextual description of the height and scale of existing development to which the proposed project is compared. The EIR analyzes the growth inducement effects that would be attributable to the proposed project and the proposed rezoning.

As stated in the first full paragraph on p. 67 of the EIR, "The project could have growth-inducing effects by demonstrating a demand for low income [emphasis added] residential housing in the area. This could thereby encourage similar development on lots currently vacant or occupied by underused buildings in the Chinatown-North Beach area." The City Planning Commission, in its' action on the reclassification would consider public neccessity, convenience, and general welfare. Thus, the Commission would consider the reclassification in light of the proposed development for elderly and handicapped lower-income housing. The rezoning, the lease of air-rights, and the approval and subsequent construction of the proposed project could encourage other sponsors of lower-income elderly and family housing to propose housing developments on other sites in the project area or elsewhere in San Francisco, including other air rights sites or sites on undeveloped public rights-of-way. However, the proposed rezoning and housing development for seniors and the physically handicapped would not set a precedent for rezoning of other sites in the project area including air-rights sites and sites on undeveloped public rights-of-way for the development of market-rate housing.

Given the limited federal and state funding available for construction of such housing, it is unlikely that the project would encourage a significant number of similar development proposals. It is also unlikely that the proposed project would encourage proposals to develop lower-income housing on the landscaped, undeveloped streets found in some of the steep hill areas of the City, as mentioned by the commenter, since these areas are generally zoned for low-density development (RH-1 and RH-2, single-family and two-family houses). Because of their steepness, distance from shopping and services, and limited public transit, relatively few of these areas would be suitable for subsidized, apartment developments regardless of their zoning. The proposed project would not encourage proposals to change existing height limits in residential areas, since the project does not include a height reclassification.

The sale or lease of public rights-of-way for development (as with the project) would require determination by the City Planning Commission that each proposal conforms to the City's Master Plan. Each individual proposal (including any proposals that might be encouraged if the proposed project were approved) would be judged on its own merits and its relationship to the surrounding neighborhood by both the City Planning Commission and the Board of Supervisors (see also responses on pp. 106 and 107 of this document).

The lease of air-rights over public rights-of-way and over City-owned land has been done infrequently in San Francisco. An air-rights lease was approved to allow construction of lower income family housing over the City parking garage at Bartlett and 24th Sts. in the Mission District. Air-rights over public streets have also been used for pedestrian bridges between commercial buildings in the Downtown and for expansion of the Stonestown Shopping Center, now under construction. Undeveloped street rights-of-way are sold occasionally for private development or to adjoining property owners. However, the City must first determine that the rights-of-way would not be needed for transportation, open space, or other public purposes./1/ Thus, a "comprehensive survey" of all public rights-of-way in San Francisco, whether proposed as sites for new development or not, would not provide relevant information about the proposed project in this EIR to the public and decision-makers because each site would be evaluated on its' particular merits.

NOTE - Public Rights-of-Way

/1/ Tony DeLucchi, Acting Director of Property, City of San Francisco, telephone conversation, February 24, 1987.

MITIGATION MEASURES

Comment

"Page 69. Measures under consideration by the project sponsor: Who holds the project sponsor accountable for the mitigation measures discussed in the EIR and who decides if these measures are needed or unsatisfactory?

"Page 71. Why should the closing of the present opening for the benefit of the project result in the mitigation measure costs being borne by the City? Can the payment determination be made before the project approval? Any solution worked out should include maintenance and operating costs." (Melinda Pon)

Response

The City Planning Commission will, in its decision regarding certification of this EIR, determine adequacy of the mitigation measures proposed in this EIR. The City Planning Commission can approve, approve with conditions or disapprove the project. The mitigation measures required by the City Planning Commission would also be made part of the conditions of approval if the project were approved. The Department of Public Works and the City Attorney would be responsible for the mitigation measure referred to by the commenter on the air quality monitoring and payment for changes to the Tunnel ventilation system, if needed, as discussed on p. 71 of the EIR. The project sponsor is a non-profit organization. The proposed project is publicly funded to provide needed housing for the elderly and handicapped population of the City. Hence, the project, unlike a private development for profit, serves a public purpose. The decision-makers have the discretion to determine the extent of mitigation measures which should be imposed, including who should pay, as part of the project approval process. However, the issue of whether the City or the sponsor pays for the studies and mitigation measures is not an issue of relevance to environmental impact analysis (see related response on p. 203 of this document). The proposed project would have no effect on maintenance and operating costs of the

Broadway Tunnel ventilation system. Those costs would continue to be the responsibility of the City of San Francisco.

Comment

"[T]he proposed mitigation measures are insufficient. The mitigation measures proposed as part of the project do little to truly mitigate the negative environmental effects . . . ; indeed, some scarcely deserve mentioning at all (such as refraining from using mirrored glass or maintaining on-site trash containers). In those areas where serious environmental impacts have been described, such as parking and air quality, the proposed mitigation measures are seriously inadequate." (Rose Chin, BTPC)

Response

The adequacy of the proposed mitigation measures in reducing or eliminating potentially significant adverse effects from the project will be determined by the City Planning Commission in its decision regarding certification of this EIR.

SHADOWS

Comment

"In addition, the draft EIR should be modified to include mitigation measures (such as setting the front of the project back even further) to allow more sun to fall on the Church plaza and steps." (Rose Chin, BTPC)

Response

Shadow effects of the project were determined to be insignificant in the Initial Study for the project (see pp. A-21 to A-25 of the EIR). (See also pp. 146 to 151 of this document.)

The alternatives to the proposed project (see pp. 78 to 83 of the EIR and pp. 204 to 239 of this document), with the exception of Alternative C (C1) and Alternative F, would have reduced shadow effects on the plaza and steps of Our Lady of Guadalupe Church, compared to the project. The City Planning Commission may approve one of the alternatives over the proposed project, including the No Project alternative.

TRANSPORTATION, CIRCULATION AND PARKING

Comment

"In the mitigation measures summary, the project sponsor proposes to limit construction to the hours of 9:00 a.m. to 6:00 p.m. (and 11:30 a.m. to 1:30 p.m. on the Catholic Church's holy days) to reduce noise impacts on nearby land uses. However, page 49 of the report notes that construction equipment would be obstructing automobile traffic within the tunnel between the hours of 9:00 a.m. to 3:00 p.m. Please clarify the hours when construction activities, including large truck deliveries, will be accessing the project site." (Dan Wong, Muni)

Response

Page 49 of the EIR has been revised to state that construction equipment would obstruct traffic in the tunnel for approximately 24 weekdays (the Draft EIR stated it would be 20 days) during the initial phases of construction from 9:00 a.m. to 3:00 p.m. and would be removed at other times (See revised construction schedule and response on p. 96 of this document). Construction in the Tunnel would be limited so as not to interfere with peak-period traffic in the tunnel. Construction activities on the project site would be allowed during peak periods since they would not obstruct tunnel traffic. Therefore, the measures are compatible. See additional proposed mitigation measure regarding truck deliveries on p. 201 of this document.

Comment

"Page 49. If the Broadway Tunnel is expected by the project sponsor to be obstructed by construction vehicles only between the hours of 9:00 a.m. to 3:00 p.m., the mitigation measures section of the report should list this as a specific transportation mitigation measure. The adoption of this mitigation measure would allow traffic and Muni surface operations to operate fairly smoothly through Broadway Tunnel during the peak commute periods." (Dan Wong, Muni)

Response

The second sentence of the first paragraph on p. 69 of the EIR (mitigation measures) is revised to read (new language is underlined):

> These would include times at which to close lanes in the Broadway Tunnel (at a maximum lanes would be closed from 9 a.m. to 3 p.m.), the method for diverting traffic from two lanes to one, and warning signs placed at key decision points in order to divert motorists to alternate routes.

Comment

"The sponsor [should] be required to provide the off-site parking for construction workers that is currently proposed as a possible mitigation measure." (Rose Chin, BTPC)

Response

The mitigation measure referred to by the commenter is currently under consideration by the project sponsor. The City Planning Commission may require inclusion of this measure as a condition of project approval.

Comment

"Page 50. Will any restrictions be placed upon truck traffic from 7 AM to 9 AM or from 4 PM to 6 PM to and from the proposed construction site as an effort to alleviate peak-hour traffic?

"Page 70. Will the truck traffic be limited during the peak traffic hours?" (Melinda Pon)

"Page 50. The report notes that any truck traffic operation during the peak commute periods would serve to worsen traffic conditions, particularly at freeway access points. As such, the project sponsor should also restrict heavy construction truck access to and from the site to between the hours of 9:00 a.m. to 3:00 p.m. as a transportation mitigation measure." (Dan Wong, Muni)

Response

The following is added as a mitigation measure proposed as part of the project, following the first paragraph on p. 69 of the EIR:

> The project sponsor would require the contractor to limit deliveries to the site by trucks to between the hours of 9 a.m. and 3 p.m., Monday through Friday, to minimize potential conflicts between trucks and peak period traffic.

AIR QUALITY

Comment

"The draft EIR essentially concludes from the . . . scanty data and flawed assumptions that CO levels within and without the tunnel will probably not change if the tunnel is covered. The sponsor goes on to almost admit the inadequacy of its data when it promises that notwithstanding this conclusion, DPW will conduct a monitoring program before and after the slab is constructed to measure CO concentrations in the tunnel; if a substantial increase is found, mitigation measures (such as adding a new wall or a fan) will be installed. Moreover, the final determination on implementation (and payment for) this mitigation shall be made in consultation with the City Attorney and the Department of Public Works. (p. 71, draft EIR).

"In other words, not only are the existing studies clearly inadequate to assess the true environmental impact of the Pineview project on air quality, but the taxpayers will be expected to pay for a proper study once the project is approved and, presumably, for the mitigation measures themselves. Mitigation measures will only be considered once the project is constructed as currently designed, when it may no longer be possible to retrofit an adequate engineering solution to provide proper tunnel ventilation, nor do so economically.

"The air quality mitigation measure proposed is not a mitigation measure at all. It appears that DPW and the taxpayers will be undertaking future CO studies and mitigation measures, not the sponsor. The proper pollution studies should be conducted before the project is approved and at the sponsor's expense; any mitigation measures should be designed into the project from the outset and paid for the sponsor.

"The draft EIR makes no real effort to assess in advance the impact on air quality of covering the tunnel, instead we are asked to approve the project first, then the appropriate study and mitigation measures will be addressed." (Rose Chin, BTPC)

"The proposed project would result in major alterations to the existing Broadway Tunnel including changes in the air flow patterns and distribution of vehicle emissions. The potential for significant environmental impact is discussed without the benefit of professional studies by a qualified expert."

"As far as air quality and noise are concerned, we would like to see a qualified air quality engineering study done. We don't feel it's appropriate to assess these impacts after the project is commenced. More study, we would like to see on this area.

"A professional study prepared by a qualified Air Quality Engineer addressing: existing air patterns in and around the Broadway Tunnel, likely changes in the patterns of fume dissipation during and after construction of the proposed project, feasible mitigation measures including calculation of increased noise levels as the result of boosted fan capacities.

"The Summary suggests that there are some residents that may be affected by the redistribution of emissions due to the proposed project. The Mitigation Measure proposed is to monitor the emissions at the sensitive areas after construction commencement. This area of the report is lacking in its investigation of possible problems and solutions and a specific study is needed (conducted by a Qualified Air Quality Engineer).

"The mitigating measures are not known to be appropriate and would be called into play after construction commencement." (Ann Ludwig, RHN)

"Page 71. The study of carbon monoxide and lead concentrations in the tunnel and surrounding areas should be made prior to project approval to ensure that mitigation measures are achievable and that the costs for these mitigation measures, for example the installation of auxiliary fans, are documented. The project sponsor should be held accountable for the extra mitigation costs." (Melinda Pon)

Response

The commenter is incorrect in implying that the project sponsor is the author of the Draft EIR. The Department of City Planning is the author of both the Draft and Final EIRs and is fully responsible for the content of the documents. The Department of City Planning's Office of Environmental Review, which is staffed by experienced environmental professionals was assisted in the preparation of this EIR by a reputable and experienced environmental consulting firm with input from professional engineers at the Department of Public Works and the Bay Area Air Quality Management District (BAAQMD). The preparers of the EIR are fully qualified to prepare such an air quality analysis.

The EIR concludes that the project would not have a significant effect on air quality. If the project were to be approved, and once the concrete base of the project was in place, if carbon monoxide levels were shown to substantially increase, then appropriate mitigation measures would be defined and implemented as described on p. 71 of the EIR. The EIR does not anticipate such an increase but in order to provide assurance to those concerned, the proposed mitigation measure is included in the project.

Even through the City is not the project sponsor, participation by City departments in implementing the mitigation measures is warranted because development of housing for low-income senior citizens is an important City priority. However, the issue of whether the City or the sponsor pays for the studies and mitigation measures is not an issue of relevance to environmental impact analysis (see related response on p. 197 of this document).

Pre-construction CO monitoring has been completed by the Department of Public Works. (See response on pp. 180 to 182 of this document concerning sampling undertaken since publication of the Draft EIR, and why the sampling was underaken. It is not uncommon that mitigation measures be worked out between a project sponsor and the City after project approval (for example, in the case where archaeological remains are found during excavation).

Comments

"If after a detailed foundation and structural design study is conducted and findings indicate that pile driving and/or other method for foundation work is necessary, the EIR should include a stipulation that amendments to the EIR be made to address the environmental impacts of the modified foundation and structural support method.

"If pile driving is necessary, I think there should be a stipulation as to amendments to the EIR to address these issues." (Melinda Pon)

Response

Preliminary foundation and structural design studies for the project have determined that pile driving would not be required. If pile driving were found to be necessary, further environmental review of the project would be necessary.

ALTERNATIVES

ALTERNATIVE A - NO PROJECT

Comments

"In a situation where public property is being irrevocably committed to private use, the EIR should include an exhaustive and thorough analysis of the alternative uses of the site as well as alternative locations for the project proposed. Instead, the discussion of alternatives in the EIR covers only six pages and casually dismissed significant options that would be far less intrusive from an environmental standpoint. The draft EIR should be amended to include an objective and comprehensive review of all alternatives in order that the City Planning Commission, other public officials and taxpayers may reach an informed decision on the appropriateness of placing this project on this site.

"Alternative Locations for the Pineview Project. From the list of public approvals, rezoning, variances and conditional uses chronicled as prerequisites in the draft EIR, it is clear that placing the Pineview project on the proposed site requires serious departures from the current zoning in the neighborhood. Given this fact, and the fact that the extraordinary conversion of public land to private use is entailed, and the fact that an irreplaceable park site is at stake, the draft EIR should be changed to include a comprehensive study of potential alternative sites for the housing project. In this regard, it is important to point out that the terms of the HUD grant restrict the project only to the City and County of San Francisco, not to sites in Chinatown itself.

"Although the draft EIR states that the sponsor considered only two locations other than the tunnel site, at a Russian Hill Neighbors board meeting on January 6, 1986, Rosalind Koo asserted that 6-7 sites had been seriously considered, including the Sacramento Street YMCA, Cameron House, a site at Broadway and Columbus, the Ping Yuen parking lot, and the tunnel site. The EIR should be amended to include a full discussion of these alternative locations, as well as possible locations in other neighborhoods.

"Turning to the Ping Yuen site discussed in the EIR, we question the sponsor's assertion that although no rezoning would be involved, similar land use and urban design effects" would be involved compared with building on the Broadway Tunnel site. It is difficult to see how these effects could possibly be as severe if the Ping Yuen site's zoning is already appropriate for the project. The sponsor highlights the possible shadowing of the Ping Yuen building as the major reason for rejecting this location.

"Given the very serious zoning and land use effects involved in locating the project at the Broadway Tunnel site, we ask that the EIR be revised to include a full discussion of the possible environmental impacts associated with locating the project next to Ping Yuen, as well as design alternatives that may mitigate those effects, such as shadowing. On the surface, it appears that the potential environmental effects of locating the project at this site are not as great as locating it over the tunnel, and the irrevocable commitment of a public park site to private hands would not be entailed. For these reasons, this alternative deserves serious attention, as the City may potentially benefit from both the housing project and park.

"Alternative A: No Project - In its discussion of Alternative A, the sponsor's implication that not building over the tunnel would preclude them from building an elderly housing project and senior community center in Chinatown simply does not stand up. Other sites, notably the Ping Yuen site and the other sites . . . are available in Chinatown. Furthermore, the senior community center is already located in Chinatown at 642 Pine Street; the sponsor merely proposes to relocate it to the Broadway Tunnel site." (Rose Chin, BTPC)

"We would like to request that the EIR contain much more extensive information on other alternative building sites for the Pineview Project. There is very superficial treatment in the EIR of this issue. Many of the sites are dispensed with in a very cursory way.

"I believe that, especially considering that we are talking about disposition of public property in this case, a very exhaustive exploration of alternative sites for the Pineview Project should be included in the EIR." (Steve Kendrick, BTPC)

"The site that they're proposing for the alternative site. . . . Washington Irving is now vacant. That site could be a beautiful place for the elderly. Another site is on Broadway and Powell, where the old French Alps Restaurant -- that has a parking lot, and the hotel is up for sale. That place is so convenient for the elderly and everything.

"I am sure that if the people would just take their time and look at these alternative sites, I am sure they could find a better site than putting it on top of the tunnel where the pollution and everything is very bad." (Ben Lau)

"Are there no other sites available? What is wrong with the site of the six story old Chinese Hospital already zoned for such a six story structure as Pineview? What is wrong with the vast acreage of the Laguna Honda, if the city wants to give away a building site? Other housing groups are now upgrading old Chinatown buildings. Why not Pineview? In any case, Pineview will be the landlord of the project and will receive the 28 million dollars." (Father McDonnell).

Response

Section 15126 of the California Environmental Quality Act (CEQA) outlines the scope of discussion required in an EIR of alternatives to a proposed project.
Section 15126(d)5 states, "the range of alternatives required in an EIR is governed by "rule of reason" that requires the EIR to set forth only those alternatives necessary

to permit a reasoned choice. The key issue is whether the selection and discussion of alternatives fosters informed decision making and informed public participation. An EIR need not consider an alternative whose effect cannot be reasonably ascertained and whose implementation is remote and speculative." CEQA specifies that the comparative effects of the alternatives should be evaluated in the EIR to the extent that they are different from the project as proposed. This discussion can be provided in less detail than the discussion of the proposed project's effects.

The alternatives chapter of the EIR does not "dismiss" any of the alternatives as stated by the commenter. The EIR merely reports the project sponsors' opinion of each alternative and the reasons for its rejection.

In response to comments, three additional alternatives are added to the EIR (Alternatives C2, E and F, see pp. 227 to 239 of this document). Also, the park alternative variant submitted in comments is responded to on pp. 222 to 224 of this document. The City Planning Commission in its action on the proposed project could approve any of the seven alternatives or a variation thereof.

The first commenter is incorrect in referring to the project site as "public land" (see response on p. 90 of this document).

As the commenter states, the primary reason for rejecting the Ping Yuen site was because of the shadowing effects on the existing apartments in the Ping Yuen building. The Ping Yuen parking lot is owned by the San Francisco Housing Authority. The limited area of the parking lot adjacent to Ping Yuen makes it impossible to design a project containing 70 units of housing which would not result in substantial shading of lower floors of Ping Yuen. As an environmental effect, shadowing of the Ping Yuen apartments would be comparable if not greater than shadow effects of the Pineview project at the Tunnel site. Due to the opposition of the Ping Yuen Tenants Association, the project sponsors believe it is unlikely that the Housing Authority would make the site available to the sponsors. Thus, a full study of environmental effects of that location would be inappropriate, since its availability for a development of this size appears unlikely.

Discussion of Alternatives in an EIR must include a 'no-project' alternative, according to CEQA Section 15126(d(2)). Though not required under CEQA regulations, discussion of alternative sites for the Pineview Senior Housing project was included on pp. 77-78 of the EIR. The relatively limited amount of funding that is available for a low-income housing development limits Pineview Housing Corporation to potential sites which can be obtained for low or no cost. Additionally, the location of the Pineview project in Chinatown is, in the sponsors opinion, important because Chinatown is an area characterized by a shortage of affordable, safe, and up-to-code housing for seniors and the physically handicapped (see Project Sponsor's Objectives on p. 9 of the EIR). The inclusion of the more speculative alternative sites requested by the commenters would not be required by CEQA. The second paragraph on p. 78 of the EIR is deleted and replaced with the following text:

> The site of the former International Hotel (Lots 11 and 13 of Assessor's Block 195) has been suggested as an alternative location for the 70 units of housing for seniors and the physically handicapped proposed by the Pineview Housing Corporation. On February 3, 1987, the developer of the Pan Magna Plaza project (84.533E), which includes the former I-Hotel site, agreed to revise his project and to develop 126 units of lower-income housing over retail and parking uses on that portion of the site. Those 126 housing units will receive construction subsidies directly from City sources (Office Affordable Housing Production Program (OAHPP) and Community Development Block Grant (CDBG) funds). That project does not have direct HUD funding. The former I-Hotel site would not be available to Pineview Housing Corporation.

(See response on pp. 113 to 114 of this document to commenter's statement that the project site is an irreplacable park site.)

Comment

"Page 77, 3rd paragraph, line 3: Please strike words 'Orangeland project' and substitute 'PUD project at the Trenton site'." (Alice Barkley)

Response

The first sentence of the third paragraph on p. 77 is revised to read (new language is underlined):

Pineview Housing Corporation received commitment from the United States Department of Housing and Urban Development (HUD) for a Section 8/202 low interest mortgage for the proposed senior housing portion of the Planned Unit Development at the Trenton St. site.

ALTERNATIVE B - PUBLIC PARK

Comment

"Page 79 Alternative B - This alternative would not block views of the church, and would keep the property in public use." (Landmarks Preservation Advisory Board)

Response

Discussion of impacts on views in the site vicinity under Alternative B includes the third sentence of the last paragraph on p. 79, "This alternative would not block any views and would not be visible beyond the immediate site vicinity." As discussed in the EIR, the Pineview project would be low-income senior and physically handicapped housing subsidized from the U.S. Department of Housing and Urban Development (HUD) and OAHPP funding; therefore, the project would serve a public purpose.

Comment

"I understand a park is an alternative. A park would be peaceful, aesthetically pleasing and would contribute to the neighborhood atmosphere; furthermore it would not increase the bad parking and traffic problems that plague this part of the City." (Debra S. Nicholson)

"Page 80. Many Chinatown residents have voiced their concern over the possible loss of Cathay Mortuary site to the City for public park and open space. Obviously, the opinion of the project sponsor does not coincide with these voices of Chinatown residents over whether the Powell Street site at Jackson Street, is the suitable area for open space." (Melinda Pon)

"To dismiss the issue of providing open space on the site by suggesting that the Cathay Mortuary might someday be developed as a park is not responsive to the requirements of the Master Plan for the neighborhood." (Ann Ludwig, RHN)

"We'd like to address the item Alternative B, public park. Our committee has been intimately involved in finding a major park in Chinatown for well over 12 years. No one else or any other group has worked for a park in Chinatown.

"As far as a new park is concerned, another site has been designated for immediate acquisition by Chinatown and the city. . .

"We'd like to make it absolutely clear that for Chinatown, our other site has had immense support and none of us has been contacted by other park groups in really trying to best serve Chinatown with a park." (Terry Ow-Wing, Committee for Better Parks and Recreation in Chinatown)

Response

The public park alternative was included in the EIR at the request of the Broadway Tunnel Park Committee (BTPC) and of other neighborhood residents. As stated in the letter of February 3, 1985 from Mary Burns, General Manager of the Recreation & Park Department to the BTPC (see p. 213 of this document), the Recreation and Park Department, "considered the use of the Broadway Tunnel surface as a location for a Chinatown Park" in their preliminary search for park sites. In a more recent letter Ms. Burns/1/ states that "The Recreation and Park Department has been attempting for more than 14 years to locate a new park site for Chinatown. . . . In 1983, the Cathay Mortuary site was selected at the preferred location for the New Chinatown Park. . . . The Recreation and Park Department is confident that all potential sites have been investigated and that the Cathay Mortuary site represents the best alternative." On February 26th, 1987, the City Planning Commission voted to uphold the Negative Declaration (86.479E) on the acquisition of the Cathay Mortuary site for a public park and determined that the proposed acquisition was in conformance with the City's Master Plan. Approvals by the Board of Supervisors would also be required before the acquisition could proceed. Provision of public open space at the Mortuary site would partially meet open space needs in the Chinatown area. That site is more centrally located to a majority of Chinatown residents than is the Pineview project site. The Broadway Tunnel site is zoned for residential development and is under the jurisdiction of the Department of Public Works. It is not designated as a proposed open space in either the adopted or proposed Recreation and Open Space Element of the City's Master Plan.

No funding has been allocated by the public sector for park development at the Broadway Tunnel site. Private sector funding has not been committed as of the date of this publication.

The environmental impacts of Alternative B (Public Park) are discussed on p. 79 of the EIR. As discussed on that page, transportation effects associated with construction activities would occur under this alternative as with the project, though for a shorter duration. After construction completion, transportation effects could be less under the Park Alternative (Alternative B) than with the proposed project.

The second sentence of the first paragraph on p. 80 of the EIR is deleted and replaced with the following:

> The Recreation and Park Department considered the use of the project site as a location for a Chinatown park in their preliminary search for park sites. In 1983, the Cathay Mortuary site was selected as the Recreation and Parks Department's preferred location for a new park in Chinatown, following 14 years of investigation by the Recreation and Park Department. No funding has been allocated by the public sector for park development at the Broadway Tunnel site. Private sector funding has not been committed as of March 16, 1987.

NOTE - Chinatown Park

/1/ Letter to Ivan Christie, Department of City Planning, February 11, 1987, concerning Negative Declaration on the Cathay Mortuary site acquisition (86.479E)

PUBLIC PARK VARIANT

Comment

"Page 77. One alternative not addressed by the EIR in Section IX Alternatives, is a derivation of Alternative B: Public Park.

"The alternative would be the construction of a low-level, open-sided, pillar-supported parking garage will full natural open ventilation of the street below at the east end of the Broadway tunnel. This alternative would enable the air space over the tunnel to remain in a modified fashion, to alleviate the congested parking situation in this area, and to keep the treasured sunshine-filled open space between the buildings already there." (Melinda Pon)

"Inspite of the desperate need for public open space in the neighborhood in question, over 1,500 signatures on petitions supporting a park on this site, and numerous letters written to the City Planning Department and supervisors on the subject, the public park alternative receives less than one page of discussion in the draft EIR. Moreover, no one from the Pineview Housing Corporation or the City Planning Department made any efforts whatsoever to contact the BTPC in the past two months in order to review its proposed plans and drawings for inclusion in the EIR discussion of alternatives.

"Residents of the neighborhood are cut off from other parks of any size by both distance and by the hilly terrain. For this reason, well before the proposal arose to place the Pineview housing project over the Broadway Tunnel, a number of organizations, including Russian Hill Neighbors and the Chinatown Committee for Better Parks and Recreation, have identified the site as a potential public park site.

"Efforts to construct a park over the Broadway Tunnel gained momentum in fall 1985 when the City's Recreation and Park Department tentatively identified the site as a possible park site and began studying whether feasibility study funds were available. Such plans were shelved, however, when the Recreation and Park Department was informed that the Mayor had designated the site for housing development. (Attachment D, pp. 128 to 129 of this document.)

"Against this background of strong neighborhood and organizational interest in a park on this site, the draft EIR should be amended to include a full discussion of the park alternative and its environmental effects, along with a set of renderings and drawings. (Attachment E, pp. 130 to 131).

"The park as proposed would have the following features: terraced landscaped areas with segregated spaces for a playing field, children's play apparatus, bocce ball court and tai chi practice; eating areas; a number of stairways and access points to facilitate cross traffic through the park; ramps for handicapped accessibility; a redesigned of the existing tunnel ventilation system to eliminate the unsightly ventilation towers and add new air intake devices and fans at the new front of the tunnel; underground parking for as many as 70 cars, to be used by the neighborhood and Alfred's Restaurant.

Exhibit B

City and County of San Francisco **Recreation and Park Department**

February 3, 1985

Ms. Rose Chin
Steering Committee
Broadway Tunnel Park Committee
1230 Grant Avenue, Box 538

Dear Ms. Chin:

Thank you for your letter of January 24, and the impressive number of petitions attached. As you may be aware the Recreation and Park Department had considered the use of the Broadway Tunnel surface as a location for a Chinatown Park.

During this period of consideration the Department was informed that City policy, as formulated by the Mayor's office and the Board of Supervisors, had designated that site for housing development. In light of this it is suggested that your feelings be made known to those officials.

The Department is currently attempting to purchase a site for a new park in the Chinatown area. It is hoped that when the location has been determined, acquisition can proceed expeditiously so that this important facility can be developed without delay.

Thank you for your interest in a new Chinatown Park. If you should have further questions on the matter, please do not hesitate to contact this office.

Very truly yours,

Mary E. Burns

Mary E. Burns
General Manager

MEB/TL:t
0285t

ATTACHMENT E

McLaren Lodge, Golden Gate Park **San Francisco 94117**

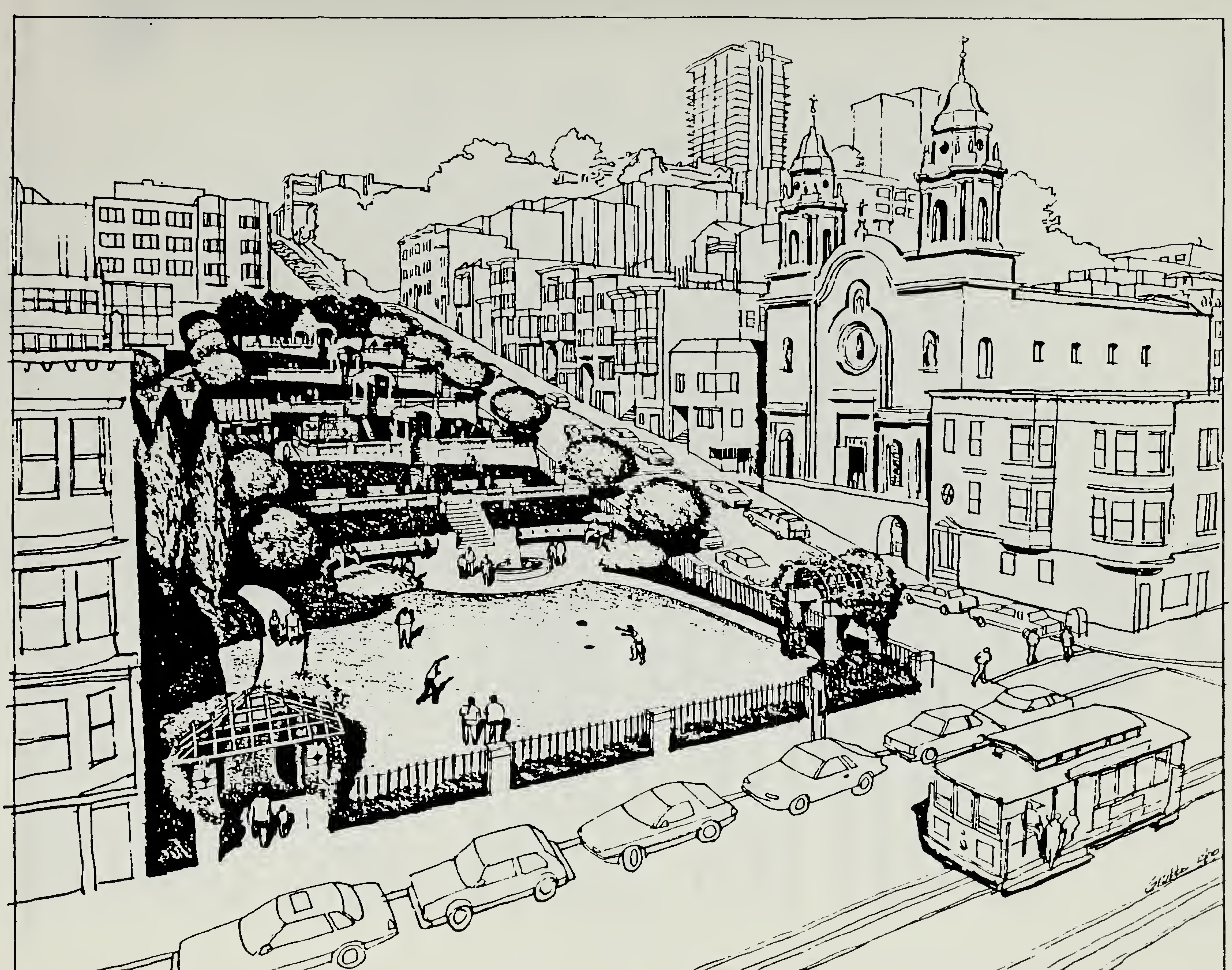
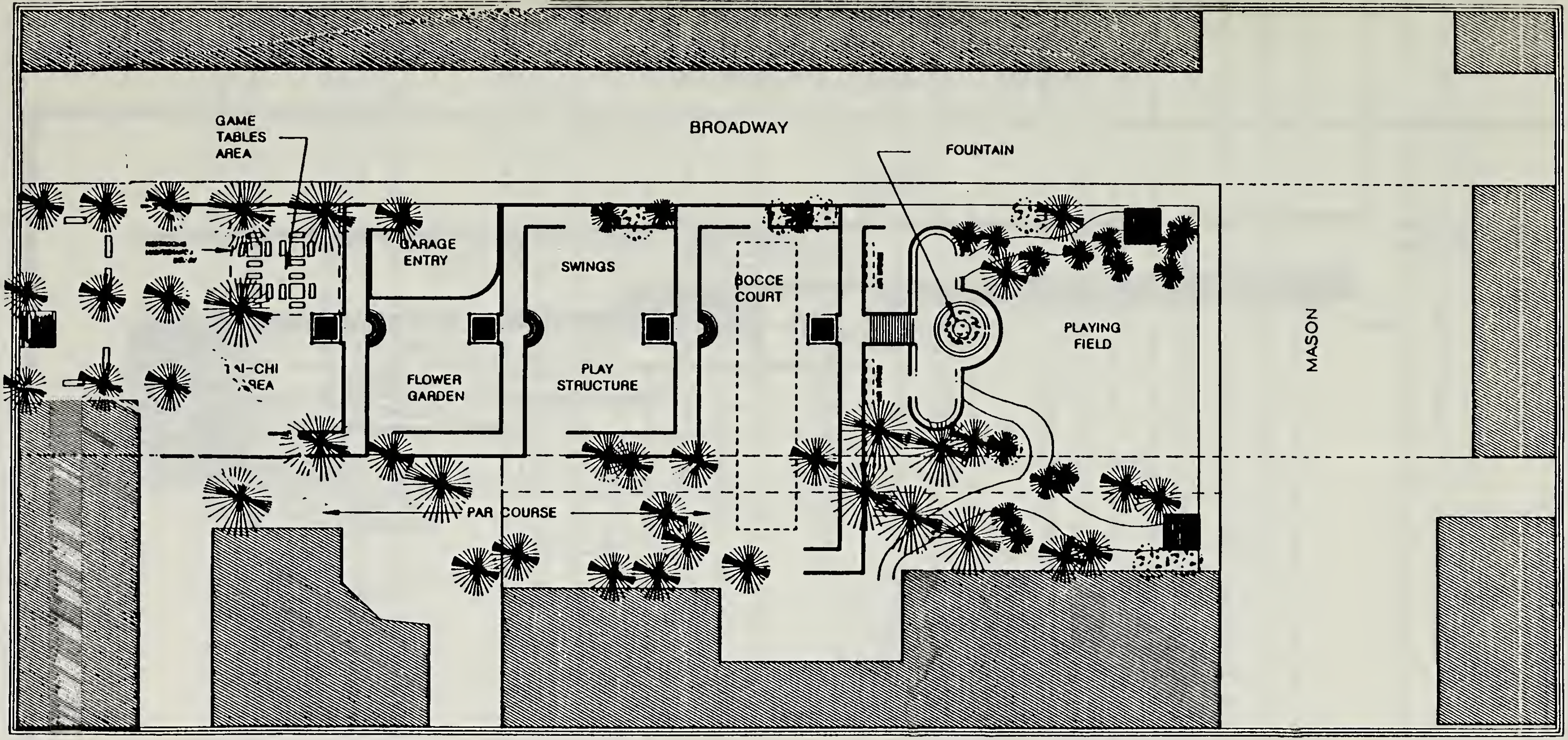


Exhibit C



BROADWAY TUNNEL PARK

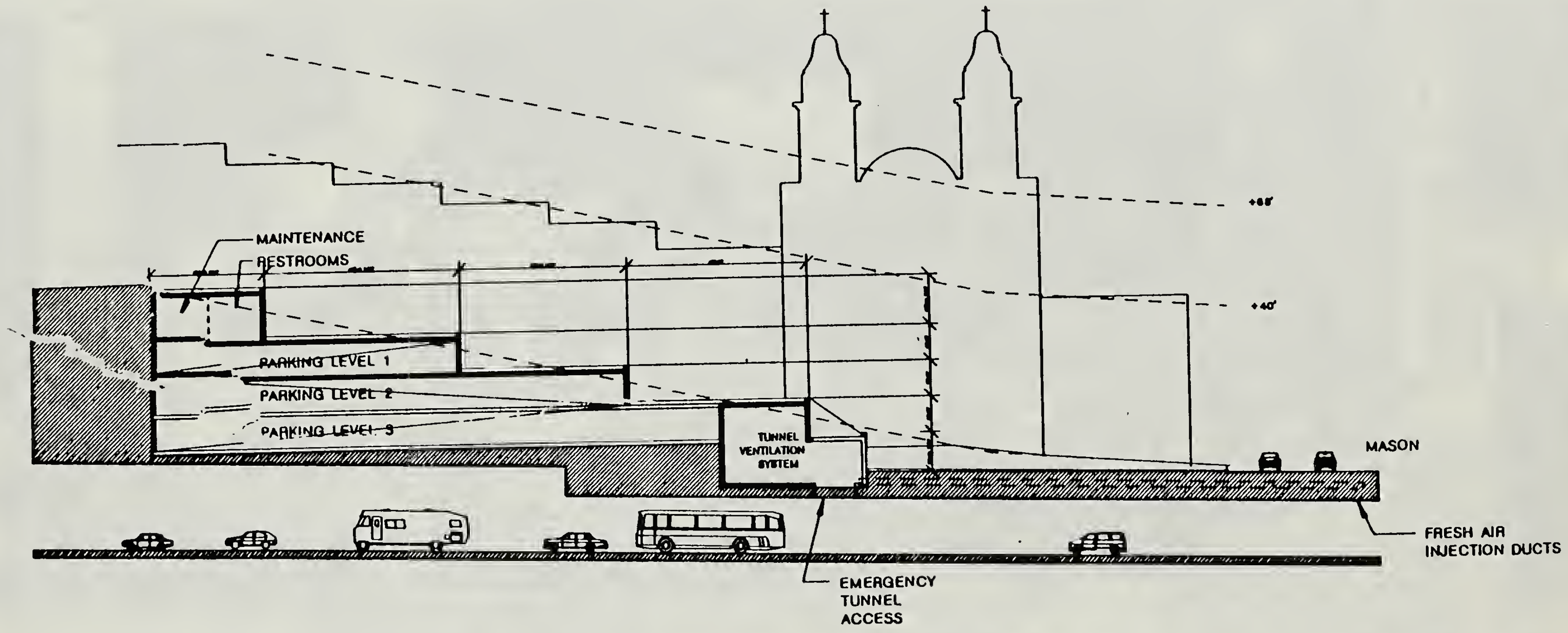
32,598 SQ.FT. OF NEW PUBLIC PARK SPACE

BROADWAY TUNNEL PARK COMMITTEE
1230 GRANT AVENUE BOX 538
SAN FRANCISCO 94133
(415) 761-8888

EBERT, HANNUM, ● VOLZ

ROYSTON HANAMOTO ALLEY

ATTACHMENT E



BROADWAY TUNNEL PARK

70 NEW NEIGHBORHOOD PARKING SPACES

BROADWAY TUNNEL PARK COMMITTEE
1230 GRANT AVENUE BOX 538
SAN FRANCISCO 94133
(415) 761-8888

EBERT HANNUM & VOLZ

ROYSTON HANAMOTO ALLEY & ABEY

ATTACHMENT E

"By providing 70 desperately needed parking spaces, the BTPC anticipates that the park project should be self-financing, both in terms of initial construction and ongoing maintenance. Private funding will be sought for various landscaping features, such as benches and play structures.

"As the draft EIR cursorily acknowledges, the environmental effects of placing a park on the Broadway Tunnel site would be far less intrusive than those associated with the proposed housing project. Converting a public right of way into a park does less damage to neighborhood zoning and land use patterns than building a structure in the middle of a street. Environmental effects on transportation, and construction noise, would be much less severe, since construction would last only five months, not 14. The proposed reventilation of the tunnel would ensure that tunnel air quality would stay the same or possibly improve, and the removal of the ventilation towers in the middle of Upper Broadway would significantly enhance views up and down Broadway. No shadows would be cast nor existing views blocked. Consistent with the Urban Design Plan elements, greater prominence would result for the historic and architecturally significant Guadalupe Church. Incorporating underground parking in the structure would result in a dramatic improvement in the neighborhood parking availability (currently at a crisis stage), as well as paying for the cost of building and maintaining the park.

"Not only should the draft EIR be amended to incorporate a full discussion of the park along the above lines, but certain opinions not grounded in fact should be deleted. For example, on p. 80 of the draft EIR reads: "No funding is available either through the public or private sector at this time for the development of a park." No facts have been put forward to support this assertion. As is discussed above, the BTPC is confident that some private funding can be raised (neighbors of Nob Hill contributed several hundred thousand dollars to the renovation of Huntington Park); moreover, the inclusion of parking will ensure that the park project will become financially self-sufficient." (Rose Chin, BTPC)

"What we are doing is asking you to include in the EIR report an alternative for the same site, and the alternative is not another building, but a park. What I am going to be doing is describing in five minutes how the park works.

"What we are trying to do is take advantage of the slope. The lower part of the hill, . . . it's basically the flattest part of the site. We are leaving that as a playing field. From that point, it starts sloping very dramatically. We feel we could possibly place three levels of parking underneath the ground, which allows for terraces above the parking, which would be flat, usable, relatively large areas for various different kinds of activities that are very much needed in the neighborhood.

"Three levels of parking will be provided. Areas for maintenance and restrooms will be provided. An area to take care of the air-handling problem, which would be needed to be addressed. And, basically, if you need more explanation about the air-handling problem, we can deal with that at another point.

"The plan shows the fullest extent the park could grow to in that particular site. The park covers the Broadway right-of-way and 20 feet to the south of the Broadway right-of-way which is right now vacant land which is used for parking. It is not paved. It's very much wasted space.

"Towards the western, uphill side of the project, there is a very wide sidewalk which we could use. We plan to take down the existing concrete superstructure over the tunnel, which is much too large for the neighborhood and not particularly residential in scale. We feel that, with the air-handling space that we are providing, we could get rid of a very large, concrete, monolithic building midway up the slope.

"To take you on a walking tour through the park, at the very lowest edge of the park is a very large playing field where people can sun, can play ball, and can do whatever they like to, which they don't have an opportunity to do, since there isn't much open space in the neighborhood.

"The next area uphill is a fountain and seating plaza which is oriented towards the Our Lady of Guadalupe Church across the street. Directly behind that are air-intake ducts for ventilation for the tunnel. Those are those little white dashes.

"The next level up is a bacchi court which people can use. The next level up from that is a playground for children, for families in the neighborhood. The next level up is a flower garden which neighbors could tend and a ramp into the parking structure below. The area above that is a tai chi area and an area for tables, for games.

"That is basically how the park would be used. Hopefully, we could acquire that south section of the project, which is over solid land, which would not have to be terraced, and which could remain in a natural slope.

"We have been very careful to provide wheelchair access throughout the entire project. It's a very steep site. Without using an awful lot of the land space, we managed to allow people in wheelchairs to get up and down the entire length of the park.

"I'd like to refer you to the drawing of the project on the left. Basically, this park is -- we understand a need for the housing project, but we also appreciate that we might also look towards the need for open space, again, in a very crowded neighborhood.

"There are three entry gates at each corner of the site and one at the very top. Each one has a different architectural character. One symbolizes the presence of the Chinese community. The other symbolizes the presence of the Italian community of North Beach right next door. And the Russian Hill Onion Dome structure entry gate is at the top of the project.

"Aesthetically, we see this as something like a Huntington Park -- very elegant and, in a way, fairly formal, but at the same time like Washington Square, a very intensely used park, which it will turn out to be.

"Again, in the foreground, there is a playing field, a seating plaza which recognizes the church. We feel that the church has gotten a very bad history of late because its community, the Spanish community, was dispersed when the tunnel was built. The church is a natural landmark to the area. This park would enhance the church, and we feel that the church would enhance the beauty of the park, just like St. Peters's and Paul's church enhances Washington Square.

"We feel this is an alternative to the site, which the EIR report, as submitted right now, has not addressed at all.

"It is one of the last opportunities to put a park in the most crowded neighborhood in the United States. We feel it really should be looked at by the Planning Department to see if it's a realistic alternative to the project that is being proposed." (Chris Grubb, BTPC)

"I would just like to explain that this design has evolved taking a lot of ideas from a large number of neighbors in this area. It's not intended to be a final design and is still being developed with input from the surrounding neighborhood. But this is a very unique site and a symbolic site in that this, is, in a sense, an intersection between three communities with a great deal of history -- the North Beach Italian community, Chinatown, and Russian Hill. The park attempts to symbolize that in a very positive way. It was designed for the enjoyment of members of all three of those communities.

"I would just like to stress that the reason we are asking the EIR to include this additional information on the park alternative, which we would like to provide, is in hopes that this information will be constructive and will help people recognize that we have a very rare opportunity here.

"It's a rare opportunity in several senses. One, this space is already public space. We can create a park here without condemnation, without demolishing buildings.

"Secondly, this is a very large space. This is a 30,000 square-foot-plus park -- much larger, by comparison, say, to the Cathay Mortuary site.

"When I mention that, I don't mean to take anything away from that endeavor. Certainly, this part of the city can use many more parks. But I just want to point out, whereas it's been suggested that is a substitute for building a park on this site, I feel that is not a substitute. This is an opportunity to create a very large park that the city should not forever lose.

"[W]e believe that the park can be fully financed by the parking revenues and by charitable donations.

"One of our requests is that in addition to including these drawings in the EIR, that we include information on how the park would be funded.

"In short, it is the belief of the park committee that between the revenues from the parking structure underneath and private donations, the park can be built, quite possibly without requiring any city funds." (Steve Kendrick, BTPC)

"I am a neighborhood resident a block away from the Broadway Tunnel.

"For many years, a number of neighbors and neighborhood groups have sought to build a park over the tunnel. In the past, I have worked to be in support for public housing for Chinatown and also for the Chinese playground on Mason Street.

"Although I am sympathetic towards senior housing, I am in favor of a park as the best use of this site. This is a unique opportunity to have to much open space that already belongs to the public.

"In January '86, the Broadway Tunnel Park Committee circulated a petition for a park over the Broadway Tunnel and received a great enthusiam from the neighborhood, which include residents above the hill and those below it -- at the bottom of the hill -- which consisted of all Chinese ladies who are in sewing factories and Chinese men and Chinese children playing on the streets, sitting on the doorsteps or street corners sunning themselves. And they all expressed the expression that they desire a little open space with a park for them to enjoy themselves.

"Besides these people, the park will benefit a school, a public school that is 50 years old, with children playing on the rooftop, mainly, and it's paved with asphalt. That is all they have.

"And besides that, we have many childhood centers around the area with non-adequate space to play, but just between buildings, which is shaded and cool.

"Although the Broadway Tunnel Park Committee wrote letters to the Planning Commission requesting the EIR, no one contacted us so we could provide more information on the park alternative. So we are requesting that these drawings, which we are going to show you, are included in the final EIR with the additional information which we will provide so that the public can have a complete set of information for alternative use of this land.

"We request that the certification of the EIR be delayed for at least three to four months to enable us to provide the City Planning Department with a full set of drawings, plans, cost estimates, assessment of environmental impacts, and other information. This analysis is crucial in order to fully assess the one alternative to the Pineview project that involves converting existing public property to another public use, rather than transferring it to private hands." (Rose Chin, BTPC)

"Instead of blocking the view of Guadalupe Church, which is a landmark, wouldn't it be nice to come from the cable cars and on top of the tunnel to build a plaza with trees and gardens and with some parking spaces adjacent to the park or to the plaza. Wouldn't it be beautiful? That way, we can preserve a landmark." (Clementina Garcia)

"[T]he last photograph, which is on p. 44 [of the EIR], is taken from Himmelman Place, which I live near. Again, it shows that you don't lose anything. However, with the elimination of that building there, which is the ventilation building, the first building in the photograph, in this park initiative they have going, all of North Beach would be once again visible." (Dennis Hearn)

"I think a park should be built with underground parking for 70 cars to perhaps gain back some of the lost ground that we have been losing every year." (Calvin Li, Neighbor)

Response

The public park proposal of the Broadway Tunnel Park Committee would have several characteristics which differ from Alternative B (Public Park) discussed on pp. 70 to 80 of the EIR. Primarily, the BTPC's public park would include, as part of the site, Lots 1 of Assessor's Block 158, which is currently used by Alfred's Restaurant for parking and possibly the right-of-way where Himmelmann Place joins Upper Broadway, and would also include the Tunnel ventilation building and the existing mini park at Himmelmann Place and Upper Broadway. The BTPC public park would also include Lot 42 of Assessor's Block 158, the City-owned utility easement, as would the project. The environmental effects of the BTPC Public Park could be greater in some areas than those of the proposed Pineview Senior Housing project, in other areas the environmental effects could be less. Environmental effects on transportation and noise during construction would be similar but could be of shorter duration than those of the project. Air Quality effects during construction could be greater, because the BTPC public park proposal requires relocation of ventilation equipment for the Broadway Tunnel, and during the relocation process there might not be ventilation of the tunnel. It is unclear how the BTPC intends to implement replacement and relocation of the existing ventilation fans. Localized traffic effects associated with provision of 45 new off-street parking spaces (70 spaces provided, less the 25 existing spaces at Alfred's lot to be relocated) with this park alternative, would be greater than the project due to more traffic through the Broadway and Mason St. intersection and on Upper Broadway. Effects on local air quality resulting from development of air-rights over the Broadway Tunnel would be the same as with the project, unless the relocation and replacement of the fans could result in improved Tunnel ventilation. This public park, as with Alternative B (Public Park) of the EIR, would not block any views and would result in no new shadow on streets, sidewalks, and the Church steps. Land use, zoning, and construction noise and vibration and potential growth inducing effects would probably be similar to the public park under Alternative B in the EIR and would be less than those under the proposed project.

The California Environmental Quality Act (CEQA), Section 15126 (d(3)) requires that discussion of alternatives in an EIR, "focus on alternatives capable of eliminating any significant adverse environmental effects or reducing them to a level of insignificance, even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly." CEQA Section 15126 (d(5)) also stipulates that, "An EIR need not consider an alternative whose effect cannot be reasonably ascertained and whose implementation is remote and speculative."

The proponents of this public park variant have not identified a reasonably probable source of funding for their proposal. In addition to necessary financing of construction costs, this park would require purchase and condemnation of the lot currently used by Alfred's restaurant for parking, could require closure of Himmelmann Place traffic access to Upper Broadway, and could require relocation of sewer lines under the utility easement, as the proposal would be developed over the easement. The proposal to remove the existing ventilation building and replace and relocate the fans would add additional expense to the project and would require further environmental analysis. The community garage portion of the BTPC park variant would also require further environmental analysis.

Thus, the BTPC public park would require, in order to be considered for approval, separate environmental review as it could result in environmental effects greater or different in nature than the proposed project.

The drawings and plans referred to by the commenter were submitted with written comments and at the Public Hearing on December 11, 1986 on the EIR. They are included here as Attachment E on pp. 215 to 216.

ALTERNATIVE C: REDUCED DENSITY

Comment

"Summary of additional documentation we feel should be required for the Final EIR: Studies, including graphic descriptions, of other Alternate schemes which would explore such possibilities as: Partial code compliance, i.e., projects of more than 35 but fewer than 70 units which could yield more open space and less bulk and thus, fewer variances. Elimination of the Senior Center as a means to reduce bulk. Partial code compliance utilizing Lot 1 with the project shifted to the South. Graphic descriptions of Alternates C and D.

"The alternatives to the project that are described in the report are not given much discussion but serve to show that there are other options for developing the site that could resolve the Urban Design concerns while serving the need of the City to provide additional housing for the elderly.

"Open space is surely a legitimate need for all of us, including the elderly, whose needs for housing none of us question. We would like to see open space in this design consolidated in such a way to provide a park-like setting in front of the church.

"Because of our view of the importance of providing open space in this area, we have long suggested that the site be expanded in such a way that a park-like open space might be provided in front of the church and thereby help to answer some of the objections to the project.

"Discussion of these alternatives (C and D), cursory though it may be, convinces us that there are yet other alternates which are not examined, which may be viable, and which could solve the troubling issues which flaw the proposed project. These alternate project schemes must be studied and presented for discussion in order to arrive at the best solution for the project and for the site. There may be much better alternatives that are not discussed in the report. A project that would have fewer units and less bulk or one that creates a sunny open plaza in front of the church and expands the site to locate some of the dwellings on a nearby site would make sense. The report describes only alternatives of 70 units or 35 units.

"The report tantalizes with the unexplored potential of alternate schemes which could resolve this and other relationships to the Guadalupe Church and surrounding residential development." (Ann Ludwig, RHN)

"Alternative C: Code Conforming. The draft EIR's treatment of . . . [this] alternative is superficial at best and misleading at worst.

"Alternative C shows what a code-conforming, reduced density option would look like, as depicted on Figure 17 (p. 81, draft EIR). We would like the draft EIR amended to show what this option looks like with one variance incorporated: the exchange of the required rear yard for front yard open space. Despite the fact that Russian Hill Neighbors in its first letter to Pineview recommended this as a positive and supportable variance, the sponsor dimisses the code-conforming alternative for reasons that this one modification would solve." (Rose Chin, BTPC)

"The particular thing I am interested in here is Alternative C on p. 80 of the proposed draft of this EIR. This Alternative C is clearly unacceptable for many of the reasons noted in the report. And if you are not prepared to go for the park alternative or the hole over the tunnel, then you are left with a 70-unit building. That's the only choice remaining in this EIR.

"However, I would like to suggest that there remains the possibility to say that a 35-unit building in fact does work on that site and would be appropriate to that site. Obviously, it would be a lot less bulky than the 70 units. It would throw smaller shadows and provide for some public open space.

"Of course, you wouldn't put that open space in the back of the building up against the tunnel ventilation system like the EIR does. What you do, you put the open space on Mason Street, where it would receive some sun and where it would be available to the public. This EIR makes clear that the Mason Street Plaza for the 70-unit project would be very heavily shaded.

"Now, a small building could be staggered up the slope of Broadway and would leave lots of space around the building. It's already clear that the people promoting a 70-unit Pineview think it's okay to design a variance with planning regulations. I don't understand why Alternative C, as it is described in this EIR, is compelled to work without any variances.

"So I would like the people who are writing this EIR to take a serious and careful look at a plausible and workable Alternative C instead of this Alternative C and this draft of the EIR, which is what you might call weak. It seems like it is made out of straw and can be blown away in a moment.

"Who knows? If the authors took a careful, thoughtful look at a 35-unit building and maybe anticipated spending some of the available funds on the rehabilitation of existing buildings elsewhere in Chinatown, they might turn up something they like.

"At the very least, I would like them to take a look. Right now, this EIR doesn't persuade me that they have taken a look at a workable smaller building.

"Let's bear in mind that whatever is done to this site is going to be there for at least 50 years, probably a lot more. Let's take the time to get it right." (Peter Geraghty)

"Alternate Schemes - The report briefly describes two alternate project schemes: 'C', a code-complying, reduced density project, and 'D', a 70-unit project built on a site expanded to the South. Both alternates are rejected due to the nature of the Sponsor's funding strategy. Neither alternate is adequately described graphically to allow evaluation of the benefits as compared to the proposed project." (Ann Ludwig, RHN)

Response

The heading for Alternative C on p. 7 (summary) and p. 80 is changed to read:

ALTERNATIVE C: REDUCED DENSITY

The following heading is added to pp. 7 (Summary) and 80, directly beneath the heading for Alternative C; and also revises the title of Figure 17, p. 81:

ALTERNATIVE C1: CODE CONFORMING REAR YARD

Alternative C2 is a variant of Alternative C (which now becomes Alternative C1) already included in the EIR and is smaller than the proposed project. This new alternative would involve no new significant environmental impacts not considered in the EIR and introduces no new information of substantial importance with regard to significant environmental effects.

A schematic drawing of Alternative C2 is added, as Figure 18, after p. 82.

The following text is added as a summary of the alternative on top of p. 8 of the EIR:

> REAR-YARD VARIANCE REQUIRED VARIANT
>
> As under Alternative C1 (Code Conforming Rear Yard), this alternative would consist of a 40-ft.-tall, four-story residential building containing 35 residential units compared to 70 units with the project; about 1,700 gsf of lounge area (3,500 gsf less than the project); no senior dining center; no office space; and seven parking spaces (five less than the project). All required open space (3,724 gsf) would be in a public plaza fronting the intersection of Mason St. and Upper Broadway.
>
> As under Alternative C1, this alternative would not require a zoning reclassification, would not require Conditional Use authorization for exceeding 40 ft. in height, or for a senior community center, in an R-District, and would not require a variance to parking requirements. This alternative would require a variance to rear-yard setback and side setback requirements, as would the project.
>
> This alternative would provide housing for 40 people compared to 77 with the project. Construction noise and vibration, and energy effects would be about 25% less than the project; land use, transportation, and growth inducing effects would be less than the project. Air quality effects would be similar to those of the project. This alternative would block views of Our Lady of Guadalupe Church from a shorter length along Mason St. than the project, and would result in less shadow effects on the Church and on adjacent streets and sidewalks, because of its shorter overall height.

The following text is added to p. 82 (after the second paragraph) of the EIR, before the discussion of Alternative D:

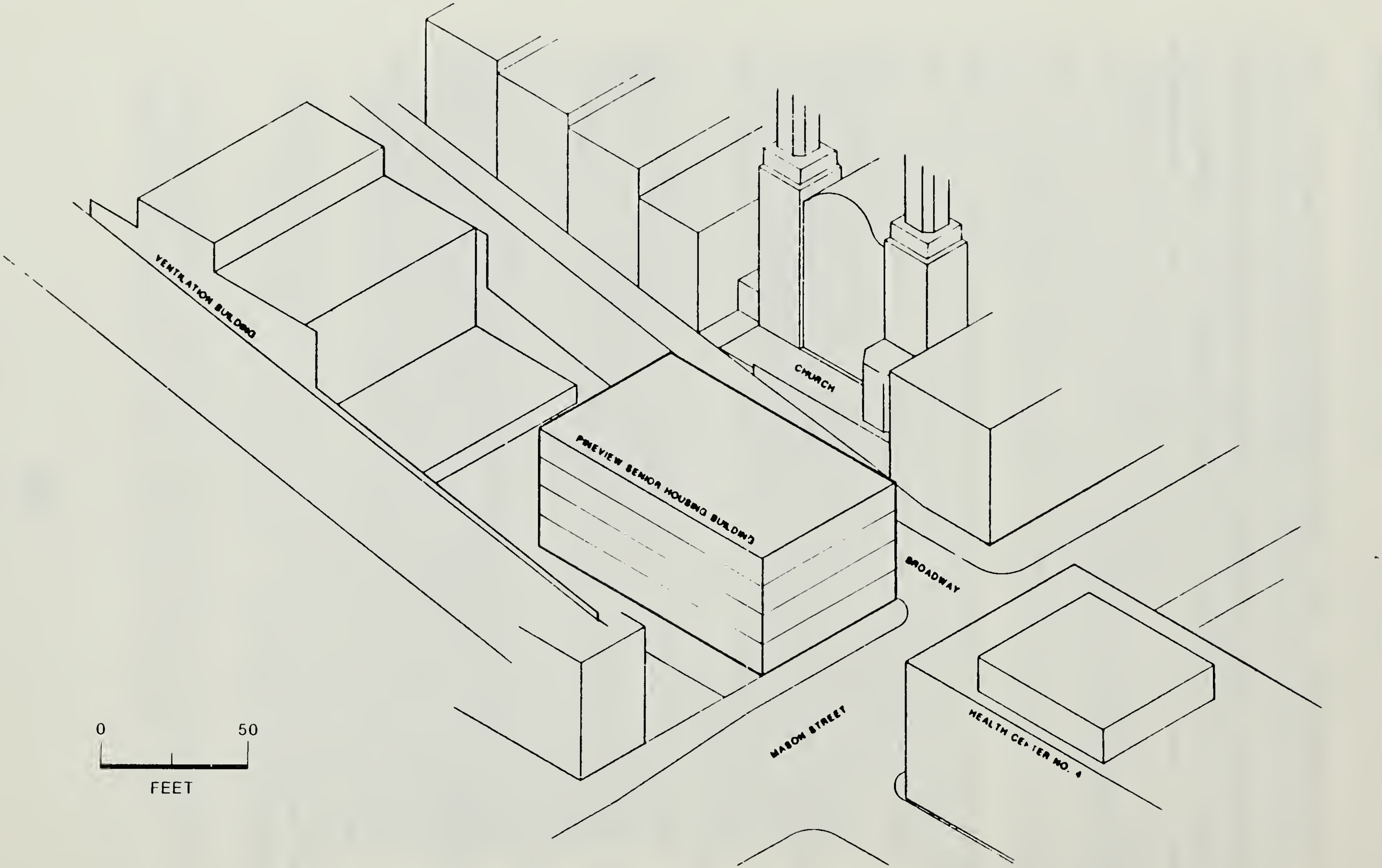


FIGURE 17
ALTERNATIVE C1
REDUCED DENSITY (CODE CONFORMING REAR YARD)

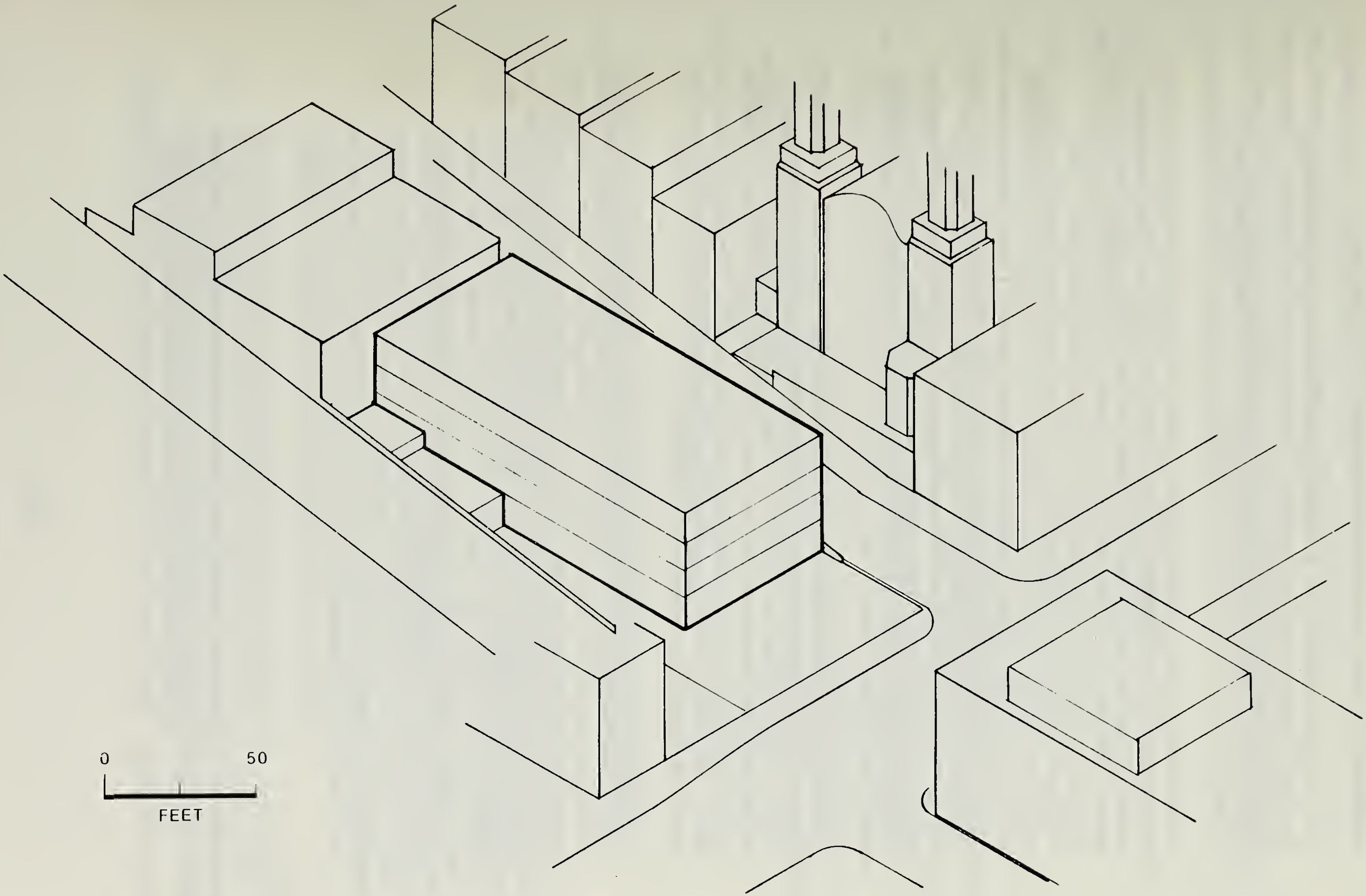


FIGURE 18
ALTERNATIVE C2
REDUCED DENSITY (REAR YARD VARIANCE)

ALTERNATIVE C2: REAR YARD VARIANCE REQUIRED

This alternative consists of a building which would not require a zoning re-classification, would not require CU authorization and would not require any exceptions from the City Planning Code, other than a variance to rear-yard setback requirements, under Section 134(a) of the Planning Code, and a variance to 25-ft.-wide window easement, under Section 140 of the Code.

This alternative would include about 13,600 gsf of residential space (35 units) compared to about 30,900 gsf (70 units) with the project. This alternative would include the same amount of senior lounge, office, support and circulation space (1,700 gsf) as Alternative C1, compared to 5,200 gsf with the project. As with Alternative C1, there would be no senior dining hall space. This alternative's building would be 40 ft. tall (four stories) and would include seven off-street parking spaces as with Alternative C1, compared to the six-story (58-ft-tall) project with 12 off-street parking spaces. This alternative building would be set back from the Mason St. property line by about 56 ft.; all required open space (3,724 gsf) would be provided in a public plaza fronting the intersection of Mason St. and Upper Broadway, compared to a public plaza of 2,685 gsf and outdoor terraces containing a total of 800 gsf with the project. This alternative would require a variance to rear-yard setback requirements, as would the project.

This alternative would provide housing for 40 people, compared to 77 with the project. Effects associated with changes in land use, and transportation effects, would be less than with the project. Construction noise and vibration, and energy would be about 25% less than with the project. Growth-inducing effects would also be less than the project, as no zoning re-classification would occur. Air quality effects resulting from development of air-rights over the Broadway Tunnel would be as for the project.

This alternative would block views of Our Lady of Guadalupe Church from a shorter length Mason St. (from sidewalks and cable cars) than would the project because of the shorter overall height of this alternative. Effects associated with urban design policies would be less because this alternative would be similar in scale and height to older residential buildings in the area. Shadow effects on the church and on streets and sidewalks would be less due to the buildings lower height.

The sponsors have rejected this alternative for the same reasons that Alternative C1 has been rejected.

ALTERNATIVE D: EXPANDED SITE

Comments

"Alternate Schemes - The report briefly describes two alternate project schemes: 'C', a code-complying, reduced density project, and 'D', a 70-unit project built on a site expanded to the South. Both alternates are rejected due to the nature of the Sponsor's funding strategy. Neither alternate is adequately described graphically to allow evaluation of the benefits as compared to the proposed project.

"Summary of additional documentation we feel should be required for the final EIR: - Graphic descriptions of Alternatives C and D

"This alternative [D] is convincing in that is shows that there are alternatives to the project." (Ann Ludwig, RHN)

Response

Under regulations of the California Environmental Quality Act (CEQA), discussion of the environmental effects of alternatives should not be at the same level of detail as discussion of environmental effects of a proposed project. Section 15126(d(4)) of CEQA states "If an alternative would cause one or more significant effects in addition to those that would be caused by the project as proposed the significant effects of the alternative shall be discussed but in less detail than the significant effects of the project as proposed."

The configuration of Alternative D has been changed.

The fourth paragraph on p. 82 of the DEIR is replaced with the following:

> This alternative would include about 30,000 gsf of residential space (70 units) as would the project. Under this alternative, the building would be six stories-tall; and would have 33 housing units on air space over the Broadway Tunnel, and would have 37 housing units on Lot 1, Block 158 compared to 70 housing units on air space over the tunnel with the project. This alternative would include 30 off-street parking spaces, including an additional 5,377 gsf of parking space (18 replacement parking spaces for Alfred's parking lot), in addition to the 12 spaces (3,400 gsf) for project residents. All but two of the parking spaces would be located in the portion of the alternative on air-space over the Tunnel. The two buildings of this alternative would be separated by a 25-feet-wide easement, and would be set back by five feet at each story.
>
> As with the project, this alternative would also include about 4,700 gsf of space in a senior center (including lounge, dining hall, and kitchen space); about 500 gsf of office space (for visiting medical and social workers); and would include a 2,685 gsf open plaza fronting Mason St. as with the project, about 1,950 gsf of which would be exclusively for pedestrian use.

The second sentence of the first paragraph on p. 83 is deleted (see Staff-Initiated Text Changes on p. 158 of this document).

The portion of the third sentence of the first paragraph on p. 83, which reads 'and because units with windows on south facade would not face an open space of 25 ft. in width' is deleted.

The fourth and fifth sentences of the first paragraph on p. 83 are deleted.

The sixth sentence of the first paragraph on p. 83 is revised to read (new language is underlined):

> This alternative would block views of the Our Lady of Guadalupe Church from a longer stretch of Mason St. than would the project, because the building on Lot 1 would not be set back from Mason St., and the building on air-rights over the Tunnel would not be set back at upper levels from the Mason St. and Upper Broadway corner under this alternative.

An isometric drawing of Alternative D (see p. 233 of this document) is inserted as Figure 19 to follow p. 83 of the EIR.

ALTERNATIVE E: NO SENIOR DINING CENTER

Comment

These [mitigation] measures clearly should be required without further discussion. They do nothing, however, to mitigate the serious parking problems stemming out of the community center...or visitors coming to see the residents themselves. What is needed is a more substantial mitigation proposed, such as ... a plan to delete the senior community center from the project altogether, in order to reduce the demand for parking while simultaneously freeing up space for additional parking. ..." (Rose Chin, BTPC)

Response

An alternative with no senior dining center is added to the EIR (see below). This alternative would involve no new significant environmental impacts not considered in

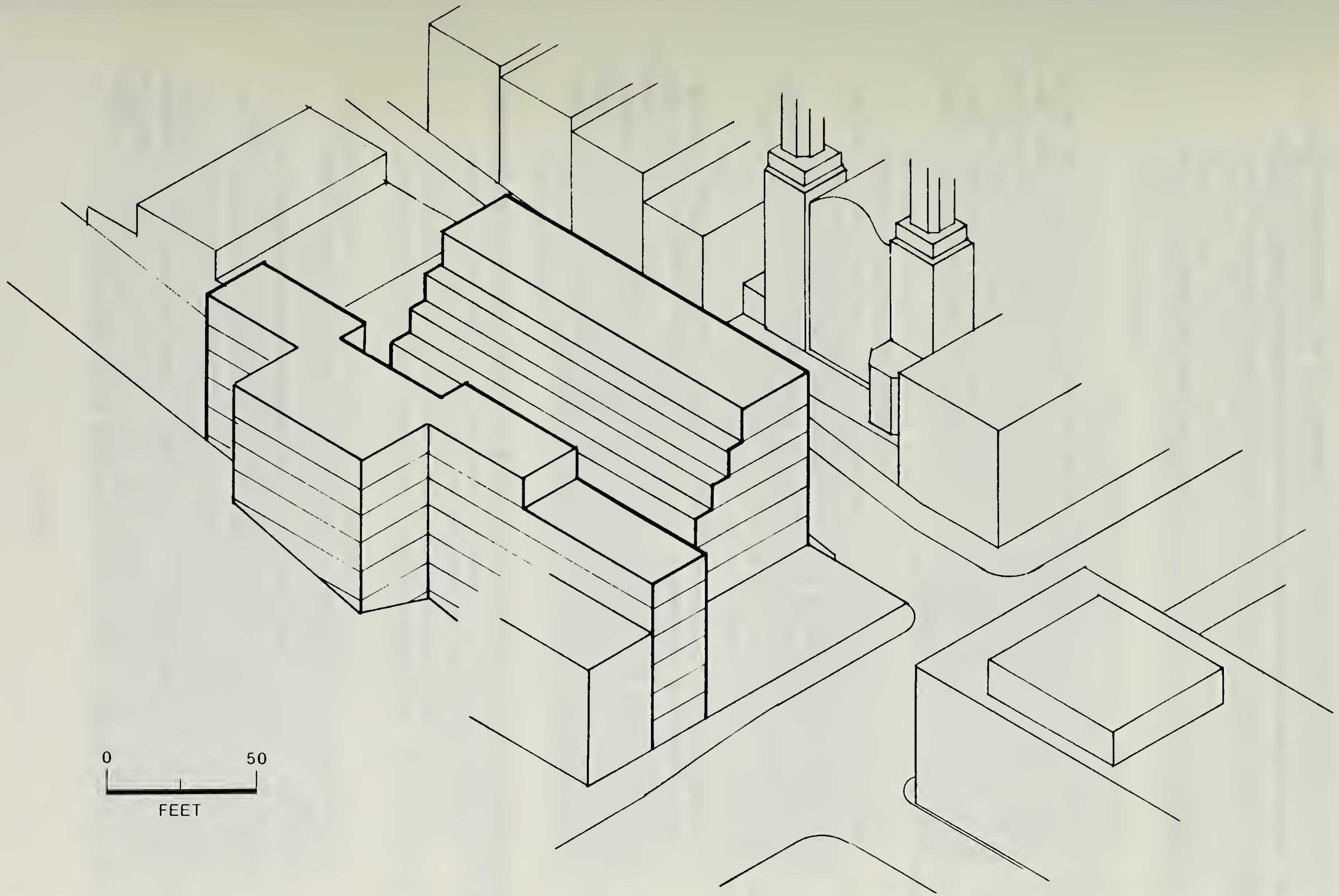


FIGURE 19
ALTERNATIVE D
EXPANDED SITE

the EIR and produces no new information of substantial importance with regard to significant environmental effects. The alternative is slightly smaller than the proposed project and would have slightly less transportation impacts.

The following is added as a summary of Alternative E to the EIR after p. 8:

> NO SENIOR DINING CENTER ALTERNATIVE
>
> This alternative would contain a 600 gsf senior lounge compared to a 4,700 gsf senior center, with dining/multi-purpose room and warming kitchen, with the project. This alternative would contain 14 off-street parking spaces compared to 12 off-street parking spaces with the project. The number of residential units (70) would be the same under this alternative as with the project. The building would be 58-ft.-tall as with the project, but would have a partial sixth floor set back from Mason St.
>
> This alternative would require a rezoning classification, would require Conditional Use authorization for exceeding 40 ft. in height in an R-District, and would require variances from rear-yard setback and side setback requirements, as would the project. This alternative would not require Conditional Use authorization for a senior community center in an R-District, and would not require a variance to parking requirements, compared to the project.
>
> Transportation effects would be about 55% less, and loading effects would be almost eliminated, compared to the project. Effects on parking would be less with two more spaces provided. Construction noise and vibration effects would be less prolonged than with the project. Air quality, shadowing, and growth inducing effects would be the same as with the project. This alternative would block views of Our Lady of Guadalupe Church to a lesser extent, though along the same length of Mason St., compared to the project.

The following alternative, Alternative E: No Senior Dining Center, is added to the EIR after p. 83.

ALTERNATIVE E: NO SENIOR DINING CENTER

> This alternative would contain about 600 gsf of space in a senior lounge compared to about 4,700 gsf in a senior center (including lounge, dining/multi-purpose room, and warming kitchen) with the project. This alternative would include about 500 gsf of office space as with the project. This alternative would include 14 off-street parking spaces, as would Alternative F, compared to 12 spaces with the project. The amount of residential space under this alternative (about 30,900 gsf in 70 units) would be the same as with the project. This alternative would be about 58-ft. tall on six floors as with the project; however, the sixth floor would be a partial floor, set back by an average of about 50 ft. from the project facade on Mason St. Other design features of this alternatives would be as for the project.

This project would be the same height and approximately the same scale, and therefore would have the same visability in short-range viewpoints as the project and the same relationship to Master Plan Urban Design Policies. The sixth floor would be set back further from Mason St. than with the project; therefore, the alternative building would block views of Our Lady of Guadalupe Church from Mason St. and cable cars travelling on Mason St. to a lesser extent, though from the same stretch of Mason St., than would the project building. This alternative would have approximately the same shadowing effects as the project.

As with the project, this alternative would require a zoning reclassification from RM-2 to RM-4; Conditional Use authorization under Section 303 of the Planning Code for exceeding 40 ft. in height in an R-District; and variances under Section 305 for not providing the required rear-yard setback; and under Section 140 of the Code for apartment windows facing a public right-of-way of less than 25 ft. in width. This alternative would not require Conditional Use Authorization under Section 209.4(a) for a senior community center in an R-District while the project would; as with Alternative F, this alternative would not require a variance under Section 151 for off-street parking spaces, which the project would require.

Effects on transportation under this alternative would be about 55% less and loading effects would be almost eliminated, compared to the project, due to elimination of delivery trips to the senior center. This alternative would generate about the same number of trips during the p.m. peak hour, as the number of residents would be the same as with the project. Effects on parking would be less, since there would be two more spaces on-site. However, most parking demand would still be from residents and their visitors under this alternative as with the project.

Construction noise and construction vibration effects would be about the same , but of slightly shorter duration, than with the project. Air quality effects resulting from development over the Broadway Tunnel would be the same as the proposed project. Growth-inducing effects would also be the same as the proposed project.

The sponsor has rejected this alternative because it would not provide a senior center. In the opinion of the project sponsor, the senior dining center would provide an essential service for the residents of the project and other low-income senior citizens and physically handicapped persons in the Chinatown-North Beach area.

ALTERNATIVE F: CODE REQUIRED PARKING ON-SITE

The following alternative, Alternative F: Code Required Parking, currently the sponsor's preferred, is added to the EIR after p. 83. This alternative would involve no new significant environmental impacts not considered in the EIR and introduces no new information of substantial importance with regard to significant environmental effects. This alternative is the same as the project, except that it provides two more off-street parking spaces, thus meeting the City Planning Code parking requirements.

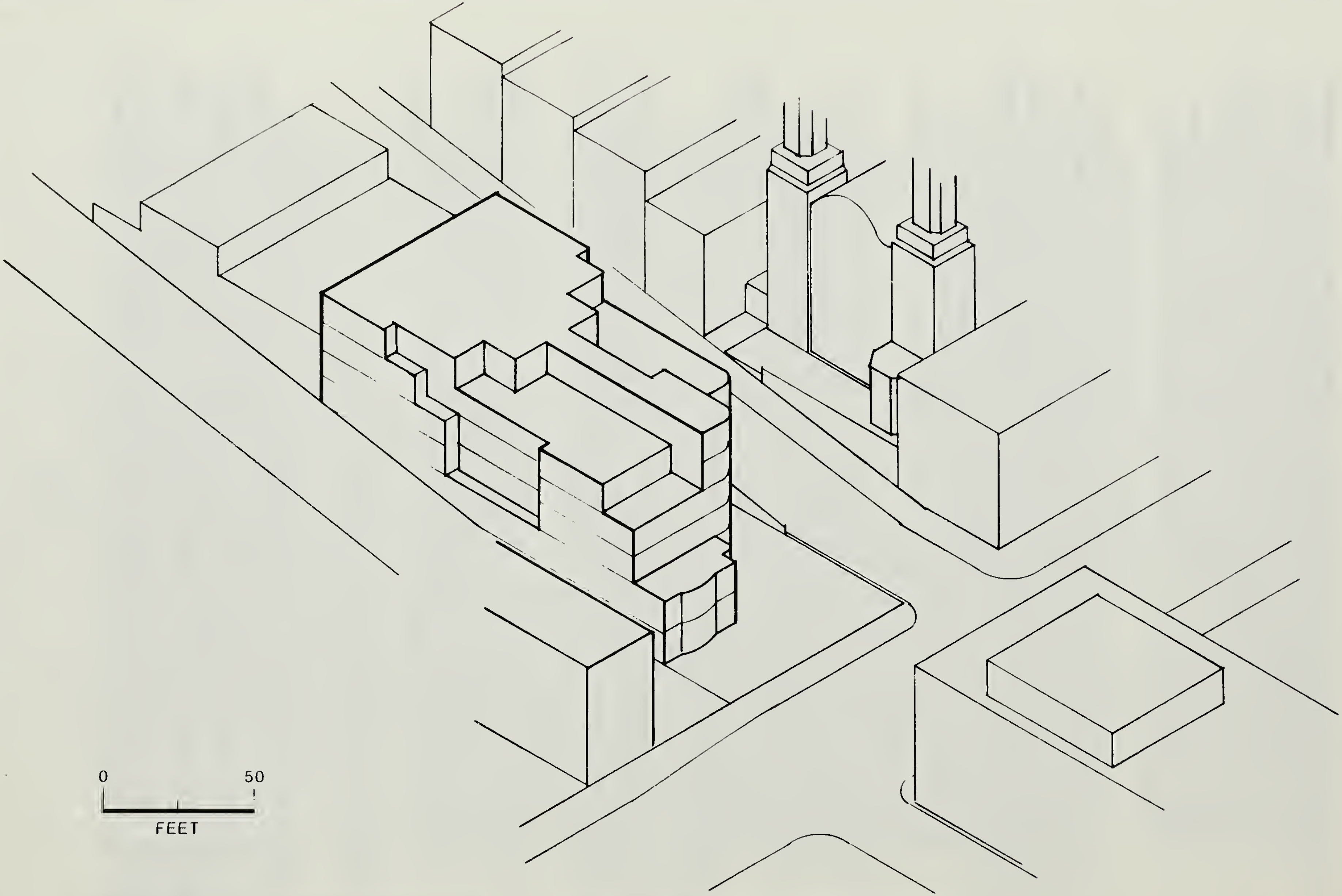


FIGURE 20
ALTERNATIVE E
NO SENIOR DINING CENTER

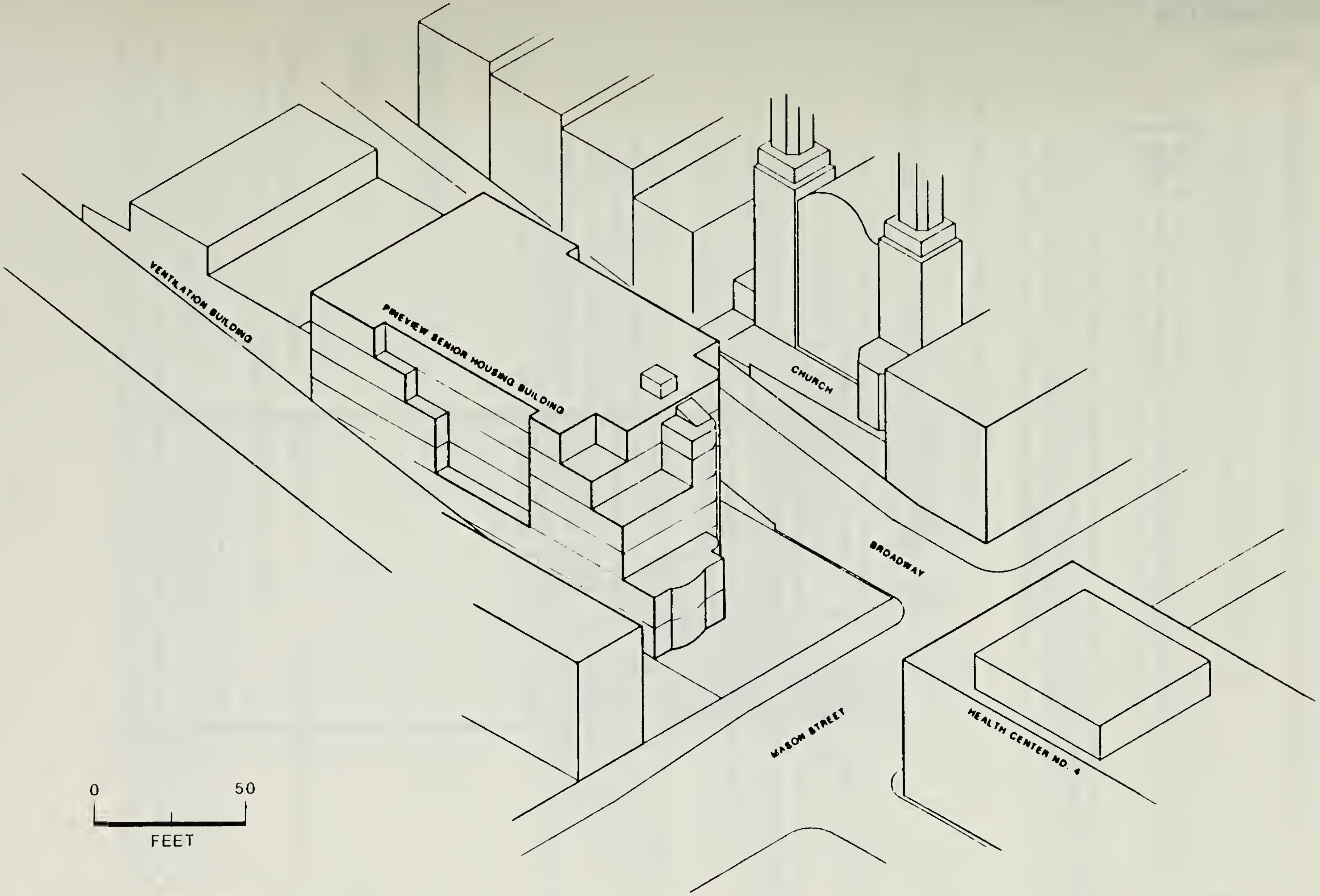


FIGURE 21
ALTERNATIVE F
CODE-REQUIRED PARKING ON-SITE

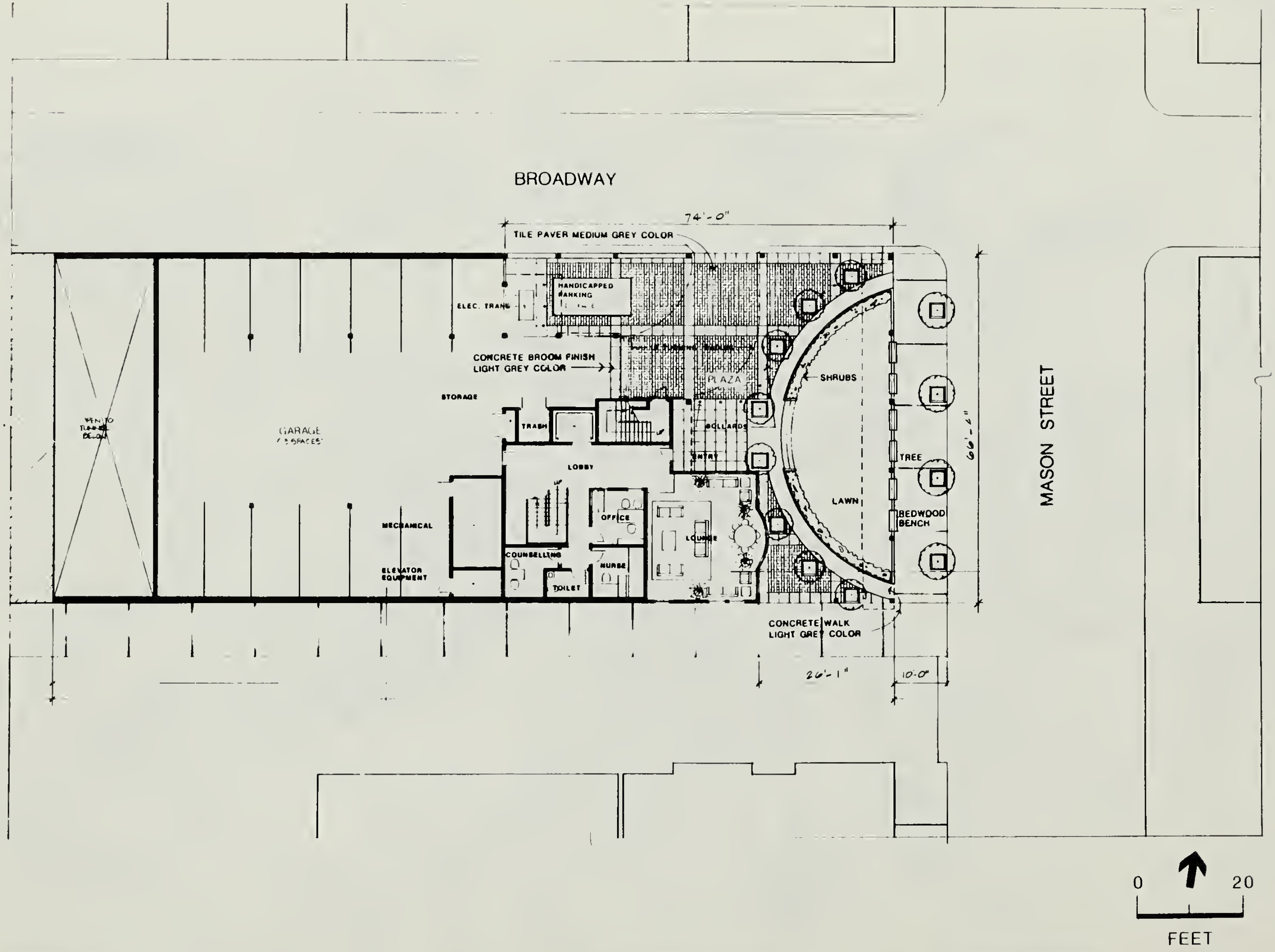


FIGURE 22
ALTERNATIVE F
GROUND FLOOR PLAN

The following is added to the EIR as a summary of Alternative F after p. 8:

CODE-REQUIRED PARKING ON-SITE ALTERNATIVE

This alternative would have 14 parking spaces on-site compared to 12 on-site spaces with the project; all other uses, building dimensions, and floor areas of this alternative would be the same as the proposed project.

This alternative would not require a variance to parking requirements; all other approval requirements would be as with the project. Parking impacts could be slightly less than the project with two additional off-street spaces provided. All other impacts of this alternative would be as for the project.

The following is added to the EIR after p. 83:

ALTERNATIVE F: CODE-REQUIRED PARKING ON-SITE

This alternative would have 14 off-street parking spaces, as required under Section 151 of the Planning Code, compared to 12 off-street spaces with the project. Under this alternative, the ground-floor would contain 13 fully-enclosed parking spaces; one parking space designed and reserved for handicapped drivers would be located outside, adjacent to the entrance to the parking garage. The ground-floor enclosed parking garage would also contain mechanical, storage and garbage container space. Other uses, building dimensions, design elements and floor areas would be as for the project.

All impacts of this alternative would be as for the project (land use, urban design, traffic, transit, construction noise and vibration, air quality, shadows, and growth inducement); parking impacts could be slightly less, with two additional off-street parking spaces provided. This alternative would not require a parking variance, as would the project. All other approval requirements would be as with the project. The project sponsor is considering this alternative; it is their preferred development program.

MISCELLANEOUS

Comment

"Adequacy of notice. In a number of instances we have not received adequate notice of the issues relevant to a full consideration of the draft EIR."

"Although the BTPC has been one of the most outspoken organizations on the subject of the appropriate use of the open area above the Broadway Tunnel, we did not receive a copy of the draft EIR until December 5, giving us only six days to review and comment on a 142-page document and to plan public testimony. Curiously, it appears from the distribution list in the EIR that our address has been altered to delete the '1230 Grant Avenue' portion of the address (p. 87, draft EIR), with the result that our mail has been incorrectly routed to a downtown P.O. box. This occurred inspite of the fact that prior letters on file with the City Planning Department have shown our address as follows:

BROADWAY TUNNEL PARK COMMITTEE
1230 Grant Ave., Box 538
San Francisco, California 94133
761-8888

We ask that our address immediately be corrected for the purpose of all future communications. Moreover, we request an extension of the December 11, 1986 public hearing in order to give us adequate time to prepare testimony." (Rose Chin, BTPC)

Response

Notice of the project was posted at and around the site on November 10, 1986. An advertisement of the publication of the Draft EIR was run in the San Francisco Progress on November 7, 1986. A notice of completion was filed with the State Secretary of Resources on November 7, 1986. Copies of the Draft EIR were made available to the public at Department of City Planning Offices and at public libraries beginning on November 7, 1986. Many active members of the Broadway Tunnel Park Committee are on the distribution list for the EIR, and were mailed copies on November 7, 1986. Therefore, it would be surprising if the BTPC were unaware of the publication of the EIR and did not have access to any copies in time to prepare for the Public Hearing on December 11, 1986. The City's environmental review procedures as specified in Article 31 of the San Francisco Administrative Code do not require that Draft EIRs be mailed to members of the general public or to neighborhood groups. The official procedures merely require that the "draft EIR should be available to the general public," Section 31.27(b)(2).

As a means of encouraging public participation in the environmental review process, copies of Draft EIRs are mailed to persons and groups so requesting them. The Department of City Planning attempts to make the mailing lists as accurate as possible but occasionally errors are made.

The address for the Broadway Tunnel Park Committee is corrected in the distribution list of the EIR to read as requested.

Comment

"The report does not . . . address other potential problems such as the . . . effect of the development on existing city services such as storm drainage." (Ann Ludwig, RHN)

Response

Potential effects of the proposed project on utilities and public services and water (including drainage patterns) was determined to be insignificant, in the Initial Study for the project (see p. A-10 of the EIR).

Comment

"Are there day restrictions on the transit of explosives through the tunnel?" (Melinda Pon)

Response

There are no special restrictions on transit of explosives through the Broadway Tunnel.

Comment

"There is a sense of security provided in the area by the valets who park cars for Alfred's Restaurant in the lot. I think the EIR should consider that as part of their study." (Al Petrie)

Response

As stated on p. 51 of the EIR, Lot 42 (Alfred's Restaurant parking lot) would be closed for three months during the construction period; the lot would re-open for parking after that time. A mitigation measure is under consideration (see p. 69 of the EIR) that would permit continued use of the lot by Alfred's throughout project construction. The method of operating parking on the lot (valet or self-park), after the lot re-opens, would be determined by the restaurant's management.

D. STAFF-INITIATED TEXT CHANGES

"Page 77, 2nd paragraph, lines 5-8: Please insert the words 'in part' after the word 'consisted'.

Page 77, 2nd paragraph, line 6 [sic]: Please add the word 're-zoning and' before the word 'project.' (Alice Barkley)

Response

The words 'in part' are inserted after the word 'consisted.' The words 're-zoning and' are inserted before the word 'project.'

Project Conformance with Bulk Limitations

The EIR was in error in stating that the project would require Conditional Use authorization for exceeding maximum bulk limits for the site. The length and diagonal dimensions for the portion of the project over 40 ft. in height would be about 85 ft. and about 109 ft., respectively, which is within the maximum dimensions of the A-Bulk district of 110 ft. and 125 ft., respectively.

The following changes to the EIR are made to correct this error: On p. 2 in the fourth paragraph, the last portion of the second sentence is deleted. On p. 7 in the fourth paragraph, the portion of the second sentence which reads "would not require CU authorization to exceed bulk limits, and . . . " is deleted. On p. 8 in the second paragraph, the fourth sentence is deleted.

The first column at the top of Table 1 on p. 12, under the heading "Height and Bulk Measurements," is revised to read:

Proposed Project

Height: 58
Length: 85 /a/
Diagonal: 109 /a/

/a/ Above height of 40 ft.

On p. 1," A zoning reclassification from the existing RM-2 classification (Residential Mixed, Moderate Density) to the proposed RM-4 classification (Residential Mixed, High Density) would be required" is inserted following the first sentence of the second full paragraph.

On p. 19, in the second paragraph, the last portion of the second sentence after 'Section 209.4(a))' is deleted.

On p. 40 in the first paragraph, the second sentence is deleted. In the third sentence of that paragraph, '124 ft.' and '135 ft.' are replaced with '85 ft.' and '109 ft.', respectively.

In Table 2 on p. 47, in the second paragraph under the heading 'Relationship of Project to Policies,' the first sentence is deleted.

On p. 83 in the first paragraph, the second sentence is deleted.

The building under Alternative C in the EIR would require a variance under Section 140 of the Planning Code. To correct this error in the EIR, the following changes are made: On p. 80, in the second paragraph, the following is added to the end of the last sentence, "except for a variance to the required 25- ft. wide easement for windows under Section 140 of the Code."

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XIII. CERTIFICATION MOTION

File No.:85.693E
Pineview Senior Housing
Assessor's Block 158, Lot 42 and Air
Rights over the
Broadway Tunnel Right of Way

SAN FRANCISCO

CITY PLANNING COMMISSION

MOTION NO. 10968

ADOPTING FINDINGS RELATED TO THE CERTIFICATION OF A FINAL ENVIRONMENTAL IMPACT REPORT FOR A PROPOSED SENIOR HOUSING APARTMENT BUILDING AND SENIOR COMMUNITY CENTER LOCATED ON AIR RIGHTS OVER THE BROADWAY TUNNEL RIGHT-OF-WAY AT THE SOUTHWEST CORNER OF BROADWAY AND MASON STREETS.

MOVED, That the San Francisco City Planning Commission (hereinafter "Commission") hereby CERTIFIES the Final Environmental Impact Report identified as case file No. 85.693E, Pineview Senior Housing (hereinafter "Project") based upon the following findings:

1) The City and County of San Francisco, acting through the Department of City Planning (hereinafter "Department") fulfilled all procedural requirements of the California Environmental Quality Act (Cal. Pub. Res. Code Section 21000 et seq., hereinafter "CEQA"), the State CEQA Guidelines (Cal. Admin. Code Title 14, Section 15000 et. seq., (hereinafter "CEQA Guidelines") and Chapter 31 of the San Francisco Administrative Code (hereinafter "Chapter 31").

a. The Department determined that an EIR was required and provided public notice of that determination by publication in a newspaper of general circulation on August 15, 1986.

b. On November 7, 1986, the Department published the Draft Environmental Impact Report (hereinafter "DEIR") and provided public notice in a newspaper of general circulation of the availability of the DEIR for public review and comment and of the date and time of the City Planning Commission public hearing on the DEIR; this notice was mailed to the Department's list of persons requesting such notice.

c. Notices of availability of the DEIR and of the date and time of the public hearing were posted near the project site by Department staff on November 10, 1986.

d. On November 7, 1986, copies of the DEIR were mailed or otherwise delivered to a list of persons requesting it, to those noted on the distribution list in the DEIR, to adjacent property owners, and to government agencies, the latter both directly and through the State Clearinghouse.

e. Notice of Completion was filed with the State Secretary of Resources via the State Clearinghouse on November 7, 1986.

2) The Commission held a duly advertised public hearing on said Draft Environmental Impact Report on December 11, 1986, at which opportunity for public comment was given, and public comment was received on the DEIR. The period for written comments ended December 11, 1986.

3) The Department prepared responses to comments on environmental issues received at the public hearing and in writing during the 35-day public review period for the DEIR, prepared revisions to the text of the DEIR in response to comments received or based on additional information that became available during the public review period, and corrected errors in the DEIR. This

material was presented in a "Draft Summary of Comments and Responses," published on March 16, 1987, was distributed to the Commission and to all parties who commented on the DEIR, and was available to others upon request at Department offices.

4) A Final Environmental Impact Report has been prepared by the Department consisting of the Draft Environmental Impact Report, any consultations and comments received during the review process, any additional information that became available, and the Summary of Comments and Responses all as required by law.

5) Project Environmental Impact Report files have been made available for review by the Commission and the public, and these files are part of the record before the Commission.

6) On March 26, 1987, the Commission reviewed and considered the Final Environmental Impact Report of 85.693E: Pineview Senior Housing and found that the contents of said report and the procedures through which the Final Environmental Impact Report was prepared, publicized and reviewed comply with the provisions of CEQA, the CEQA Guidelines and Chapter 31.

7) The project sponsor has indicated that the presently preferred alternative is Alternative F: Code Required Parking On-Site described in the Final Environmental Impact Report.

8) The Commission hereby does find that the Final Environmental Impact Report concerning 85.693E: Pineview Senior Housing is adequate, accurate and objective, and that the Summary of Comments and Responses contains no significant revisions to the Draft Environmental Impact Report, and hereby does CERTIFY THE COMPLETION of said Final Environmental Impact Report in compliance with CEQA and the CEQA Guidelines.

9) The Commission, in certifying the completion of said Final Environmental Impact Report, hereby does find that the project described in the Environmental Impact Report and the project preferred by the project sponsor, described as Alternative F: Code Required Parking On-Site in the Final Environmental Impact Report, will have no significant effects on the environment.

I hereby certify that the foregoing Motion was adopted by the City Planning Commission at its regular meeting of March 26, 1987.

Lori Yamauchi
Secretary

AYES: Commissioners Bierman, Hemphill, Karasick, Nakashima, Rosenblatt, Wright

NOES: None

ABSENT: Commissioner Allen

ADOPTED: March 26, 1987

CRS:emh

XIV. APPENDICES

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APPENDIX A: INITIAL STUDY

DEPARTMENT OF CITY PLANNING 450 McALLISTER STREET · SAN FRANCISCO CALIFORNIA 94102

NOTICE THAT AN ENVIRONMENTAL IMPACT REPORT IS DETERMINED TO BE REQUIRED

Date of this Notice: August 15, 1986

Lead Agency: City and County of San Francisco, Department of City Planning
450 McAllister Street - 6th Floor, San Francisco, CA 94102

Agency Contact Person: Catherine Siegel Telephone: (415) 558-5261

Project Title: 85.693ECRVZ - Pineview Senior Housing

Contact Person: Pineview Housing Corp

Project Contact Person: Yvonne Lee

Project Address: Southwest corner of Broadway and Mason

Assessor's Block(s) and Lot(s): A/B 158, Lot 42 and Air Rights over the Broadway Tunnel right of way

City and County: San Francisco

Project Description: Construct a six story, 70 unit elderly and handicapped rental apartment building on air rights over the Broadway Tunnel at the southwestern corner of Broadway and Mason, construction and rents to be subsidized by HUD. 12 off-street parking spaces would be provided where 14 are required. A 4,700 square foot multi-purpose senior center would be included in the building. The City would lease the air rights for a nominal fee. A rezoning from RM-2 to RM-4 would be required, as would Conditional Use authorization and variance approval.

THIS PROJECT MAY HAVE A SIGNIFICANT EFFECT ON THE ENVIRONMENT AND AN ENVIRONMENTAL IMPACT REPORT IS REQUIRED. This determination is based upon the criteria of the Guidelines of the State Secretary for Resources, Sections 15063 (Initial Study), 15064 (Determining Significant Effect), and 15065 (Mandatory Findings of Significance), and the following reasons, as documented in the Environmental Evaluation (Initial Study) for the project, which is attached.

Deadline for Filing of an Appeal of this Determination to the City Planning Commission: August 25, 1986 .

An appeal requires: 1) a letter specifying the grounds for the appeal, and;
2) a $50.00 filing fee.

Barbara W. Sahm

BARBARA W. SAHM, Environmental Review Officer

BWS:CS:js
1062E

ER5 6/85

PINEVIEW SENIOR HOUSING

Initial Study

85.693 ECRVZ

August 15, 1986

I. PROJECT DESCRIPTION

The proposed Pineview Senior Housing project would construct 70 apartments, including 69 apartments for occupancy by lower income senior citizens and handicapped persons, and one apartment for the resident manager. Construction and rents would be subsidized by the federal government through HUD's Section 8/202 program. The project site is at the southwest corner of Broadway and Mason Streets on City air rights over the Broadway Tunnel right-of-way. There is no assessor's block or lot number, but the site directly adjoins Lot 42, Assessor's Block 158 to the south (see Figure 1, page 4). Lot 42 is also owned by the City. It would function for the proposed building as a light and air easement for the apartments on the south side of the building. The Department of Public Works has a easement for an existing 12 inch sewer main on Lot 42 so that the lot cannot be used for any permanent construction that would interfere with sewer maintenance.

The total site area (including both the air rights over the roadway and Lot 158/42) is 12,615 square feet. The existing open area over the Tunnel is 66.5 feet wide and 160 feet long and 10,640 square feet in area.

The total constructed area of the project would be 39,500 gross square feet (gsf) including all housing, common areas, parking and mechanical areas.

The proposed project would have seven one-bedroom units (445 to 480 square feet) and 63 studio units (300 to 372 square feet) for a total of 30,900 gross square feet.

Each unit would have a complete kitchen and bath. A 4,700 square foot multi-purpose senior center would be located on the second floor. The senior center would serve seniors in the surrounding neighborhood in addition to the residents of the project. There would be a 2,880 square foot dining/multipurpose room, a warming kitchen, an office for visiting medical and social workers and a social lounge. Open space would be provided by a plaza in front of the building, of about 2,685 square foot, and by three upper level terraces of about 800 square feet total. Pedestrian access would be from Mason Street. Vehicular access would be from Broadway to 10 enclosed parking spaces on the rear of the ground floor of the building. Two additional covered spaces would be along Broadway by the garage entrance for a total of 12 off-street spaces for residents, visitors and staff. Fourteen spaces are required by the City Planning Code.

The building would be 6 stories high with setbacks at the third, fifth and sixth levels. At its highest point, the building would be about 58 feet high relative to Mason Street.

II. SUMMARY OF POTENTIAL ENVIRONMENTAL EFFECTS

A. EFFECTS FOUND TO BE POTENTIALLY SIGNIFICANT

Some of the effects that would be generated by the proposed project could be potentially significant. Impacts that require further analysis in an EIR are: land use and zoning in the project vicinity; relationship of the project to the Master Plan; urban design; views; architectural and historic resources; localized, project-specific transportation; construction noise and localized air quality related to the Tunnel.

B. INSIGNIFICANT EFFECTS

Some environmental effects would either be insignificant or would be mitigated through measures incorporated into the project design.

These require no further environmental analysis and will not be addressed further in the EIR.

Visual Quality: The proposed project would not generate any light or glare impacts on other properties or land uses.

Population: The proposed project would not displace any existing land uses or people. At full occupancy the project would house about 77 residents. The senior center would serve lunch to a maximum of 150 persons and require about seven staff on-site during the noon hours.

Operational Noise: After completion, project operation including traffic generated by the project, would not cause a perceptible increase in noise in the project vicinity. The project sponsor would comply with Title 25 of the California Government Code so that interior noise levels would not exceed 45 dB. A mitigation measure has been included in the project to reduce noise from vehicular traffic and cable cars to 65 dBa in the front plaza area of the project.

Air Quality: Construction of the proposed project would not create objectionable odors, nor would it involve burning any materials. Construction activities could temporarily affect air quality; a measure to reduce emissions to an insignificant level is included in the project (see p. 30). Project operation would not violate any ambient air quality standard, expose any sensitive receptors to air pollutants, or create any objectionable odors. The contribution of project traffic and cumulative traffic to overall air pollutants in the Bay Area would be marginal.

Shadows and Wind: The proposed project would not shade any properties subject to Proposition K.

In the morning and noon hours in mid-winter, the Guadalupe Church steps would be shaded by the project. The steps would be partially shaded during those hours in the fall and late winter months.

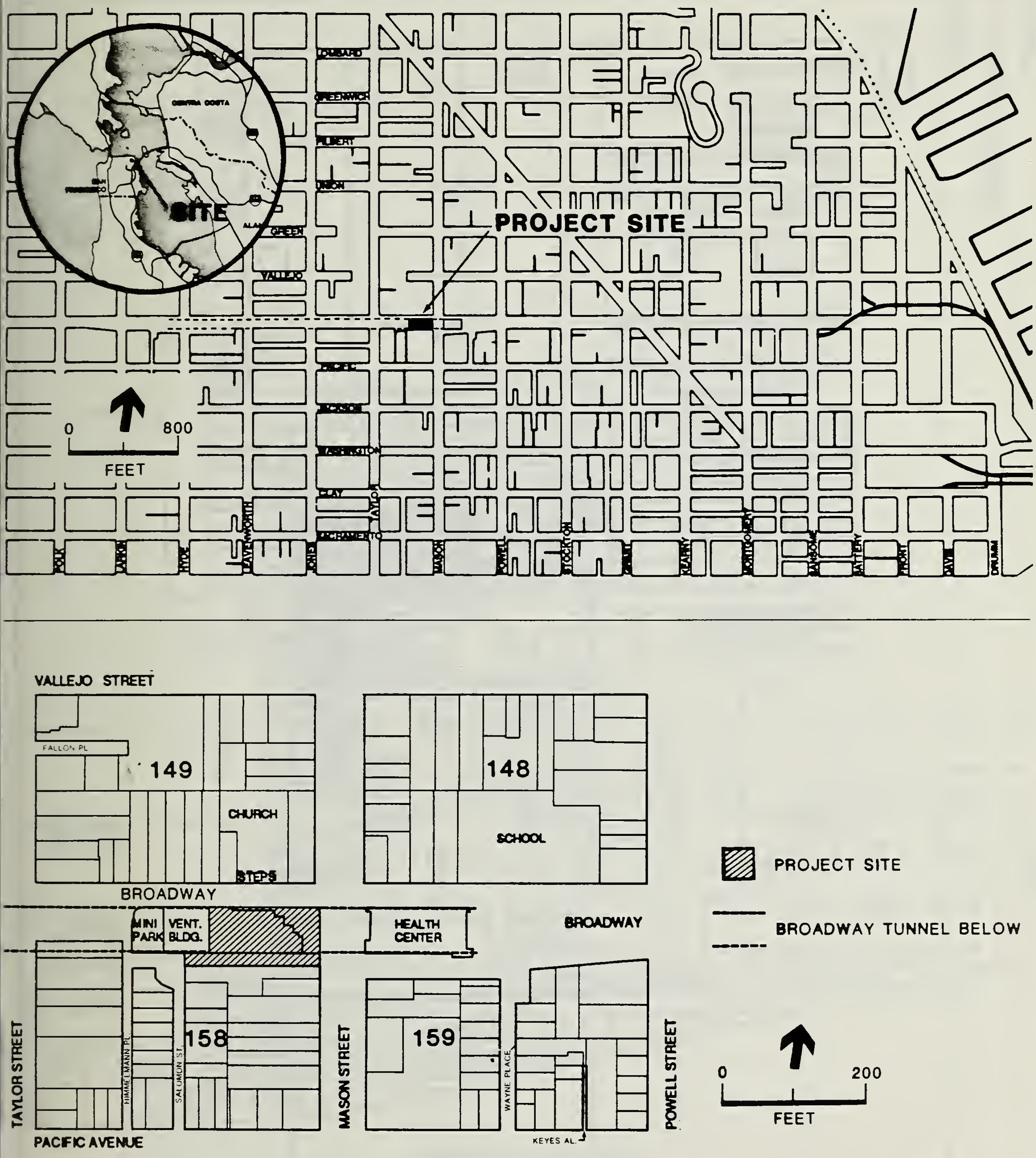
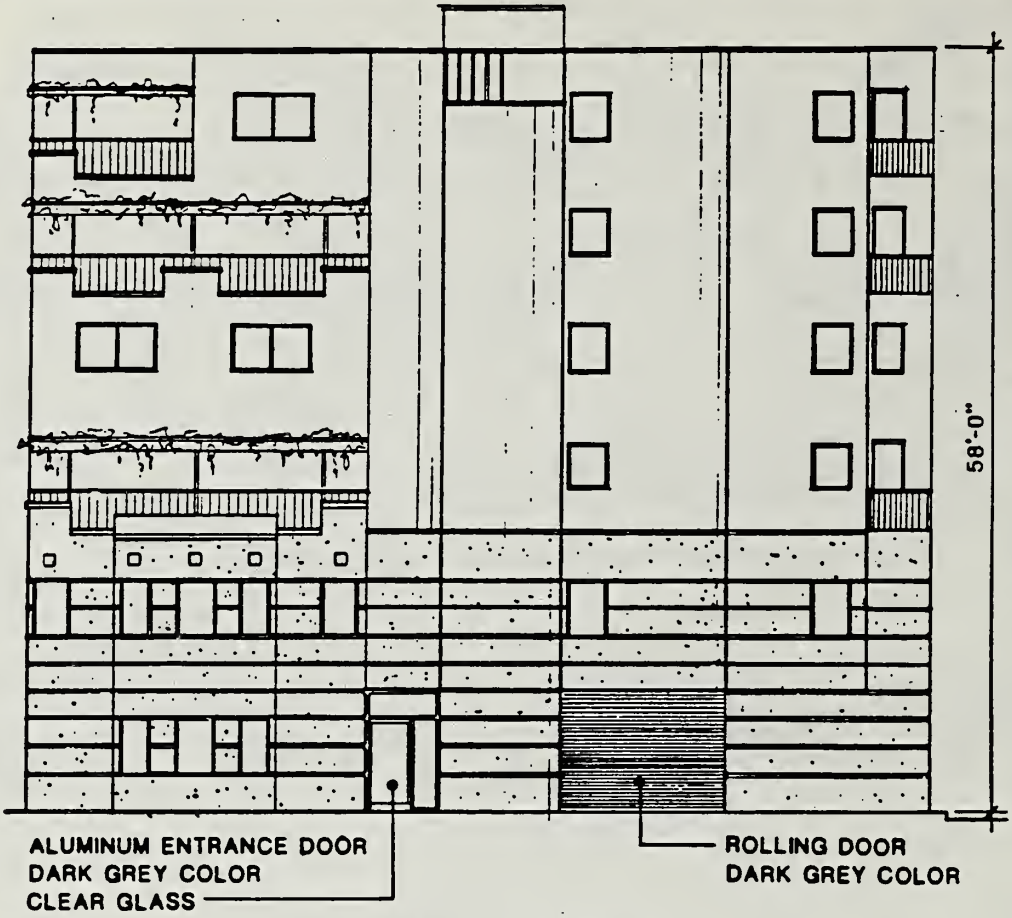
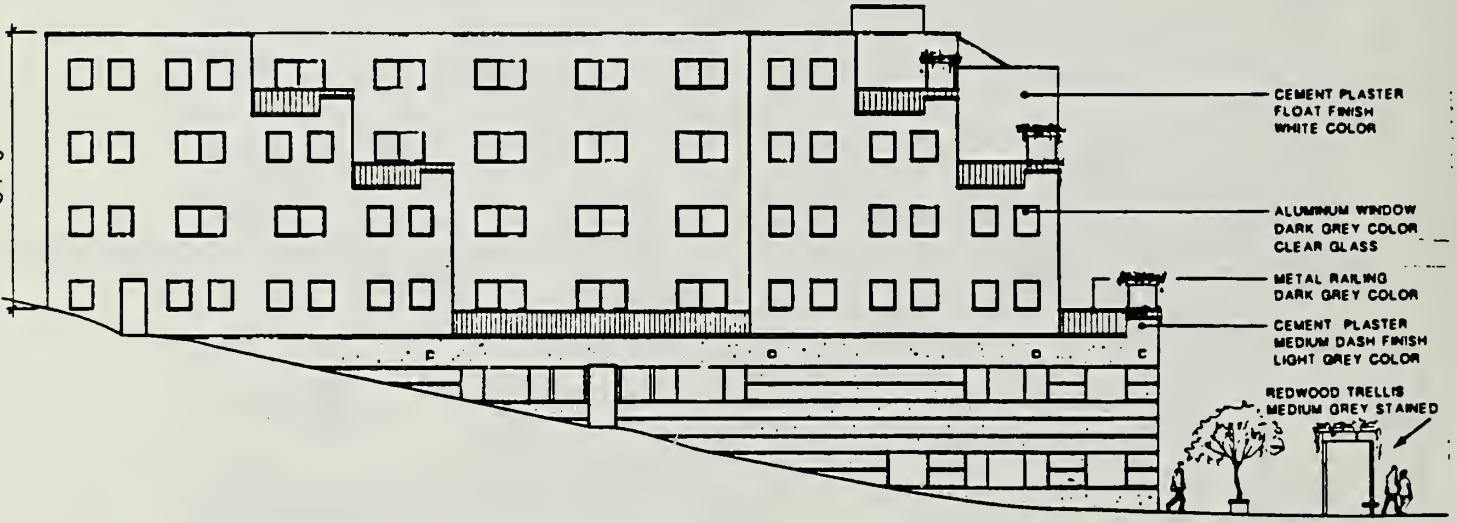


FIGURE 1
PROJECT LOCATION
PINEVIEW

SOURCE: ESA



WEST ELEVATION



NORTH ELEVATION

FIGURE 2
PROJECT ELEVATIONS
PINEVIEW

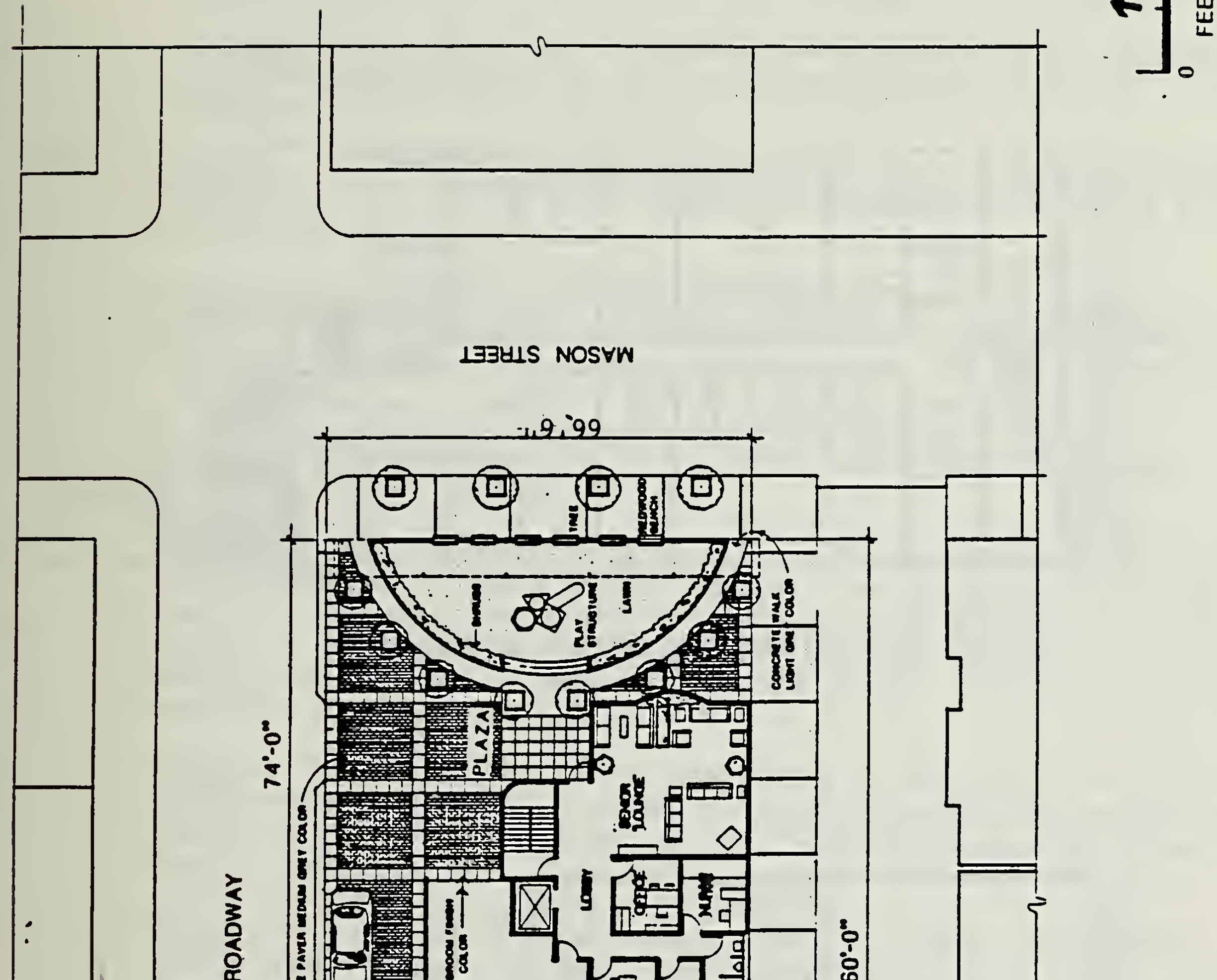
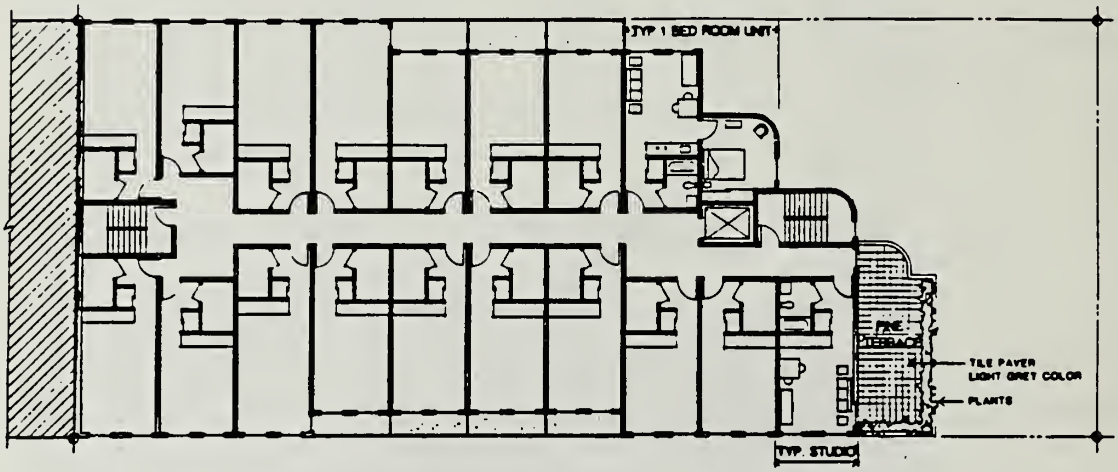
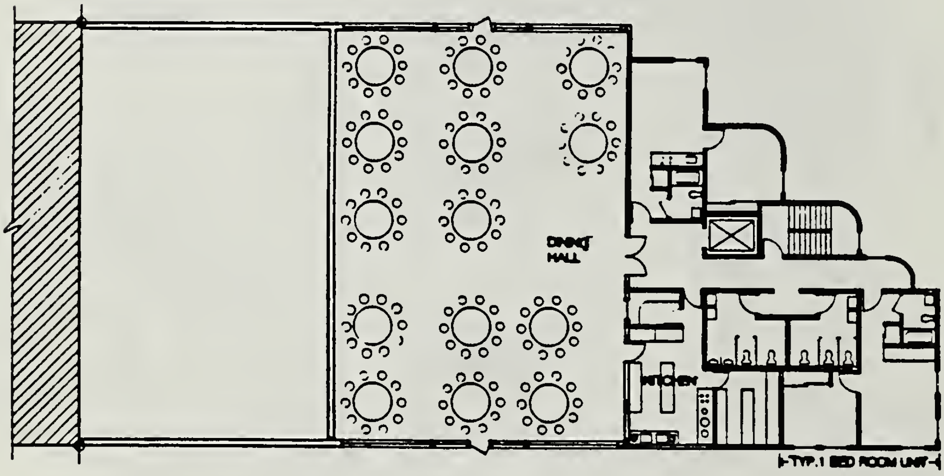


FIGURE 3
GROUND FLOOR PLAN
PINEVIEW



THIRD & FOURTH FLOOR PLAN



SECOND FLOOR PLAN

FIGURE

SECOND, THIRD AND FOURTH FLOOR PLAN

PINEVIEV

From March through September there would be no shadow on the steps. The proposed project would not affect wind speeds in the project area.

Utilities/Public Services: Increased demand for public services and utilities attributable to the proposed project would not require additional personnel or equipment.

Biology: The project would have no effect on any rare or endangered plant or animal life or animal habitat and would not interfere with any resident or migratory species.

Geology/Topography: Pile-driving would not be required. A geotechnical report would be prepared by a California-licensed soils engineer. Building construction would conform to the recommendations in that report.

Water: The project would not affect water quality, other water resources, or drainage patterns.

Hazards: The proposed project would not be affected by hazardous uses nor would it cause health hazards. An evacuation and emergency response plan would be developed by the project sponsor as part of the project. The project would not increase hazards from fire or explosion within the Broadway Tunnel. It would not significantly affect emergency access to the Tunnel.

Energy: The project would be constructed to conform with the energy requirements of Title 24. It would not encourage activities that would result in the wasteful use of energy or have a substantial effect on a natural resource.

Cultural: Project construction would not require excavation. The center supports for the building may require drilled piers. Because the project site is beyond the old San Francisco shoreline, the potential for encountering cultural resources during construction would be limited. The project sponsor has included a mitigation measure addressing any potential impact (See page 30).

III. ENVIRONMENTAL SETTING

A. COMPATIBILITY WITH EXISTING ZONING AND PLANS

	Not Applicable	Discussed
1. Discuss any variances, special authorizations, or changes proposed to the City Planning Code or Zoning Map, if applicable.	___	X

*2. Discuss any conflicts with the Master Plan of the City and County of San Francisco, if applicable.	___	X
*3. Discuss any conflicts with any other adopted environmental plans and goals of the City or Region, if applicable.	X	___

The project site is within a RM-2 (Mixed, Moderate Density) Residential district and a 65-A height and bulk district, the adjoining lots and blocks are also zoned RM-2. Lots along Pacific Avenue, one block south are in the RC-3 (Residential-Commercial Combined, Medium Density) district. The proposed building would require a rezoning to the RM-4 (Mixed, High Density) district in order to accommodate all of the 70 units on the site. Under the existing RM-2 zoning, one unit per 600 square feet of lot area is permitted. Section 290.1(m) of the City Planning Code permits an increase in density not exceeding twice the number of units otherwise permitted for housing designed and occupied exclusively by senior citizens or handicapped persons. A maximum of 42 units could be permitted under the present zoning, with the density bonus. Under RM-3 zoning, a maximum of 63 units could be permitted with the density bonus. Under the proposed zoning of RM-4 (which permits one unit per 200 square feet of lot area), a maximum of 126 units could be permitted on the site with the density bonus.

The proposed project would comply with the height limit of the 65-A Height and Bulk District in which the site would be located. However, the City Planning Code requires Conditional Use authorization for any building over 40 feet in a residential district.

The proposed project would exceed the bulk limitations of the "A" Bulk District. Conditional Use authorization would be required in order to exceed the bulk limits. Conditional use would also be necessary to permit the senior community center use within a residential district (Section 209.4 of the City Planning Code).

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*Derived from State EIR Guidelines, Appendix G, normally significant effect.

A rear yard of 25% of the lot depth (which would be 40 feet for this site) is required in the proposed RM-4 district. The proposed project would not include a rear yard. The building would extend to the rear property line and there would be a plaza in front of the building facing Mason and Broadway (see Figure 4). A variance would be necessary to permit less than the required rear yard.

A variance would also be necessary because 35 of the dwelling units on the south side of the building would have their only windows facing an open area which would be less than 25 feet in width as required by Section 140 of the City Planning Code.

In both the RM-2 and the RM-4 districts, one off-street parking space is required for each dwelling unit. The Planning Code (Section 151) reduces the parking requirements to one-fifth of the otherwise required number for senior and handicapped housing. Therefore, 14 spaces would be required for the proposed project, 2 more than would be provided. There would be no parking requirement for the senior center use since the occupied floor area would be less than 5,000 square feet. A variance would be required for less than required parking.

The actions required for project approval will be discussed further in the EIR. The proposed project's relationship to the policies and objectives of the Master Plan will be discussed in the EIR.

B. ENVIRONMENTAL EFFECTS

1. Land Use. Could the project:	Yes	No	Discussed
*a. Disrupt or divide the physical arrangement of an established community.		X	X
b. Have any substantial impact upon the existing character of the vicinity?		X	X

*Derived from State EIR Guidelines, Appendix G, normally significant effect.

The proposed project site is located on the lower slopes of the eastern side of Russian Hill on the edge of San Francisco's traditional "Chinatown" area. About one block to the east is the border of the Chinatown Rezoning Study Area, the subject of a land use planning and zoning study currently being conducted by the Department of City Planning.

The proposed project involves construction on air rights over the Broadway Tunnel right-of-way. The proposed apartments for the elderly and senior community center would be permitted under both the existing RM-2 zoning and the proposed RM-4 zoning.

The general character of the neighborhood is moderate density residential. The most common land use within one to two blocks of the site is two and three family dwellings, interspersed with 6 to 12 unit apartment buildings.

Across Broadway to the north is the Our Lady of Guadelupe Church, a Catholic church which seats about 250 persons. The highrise Royal Towers condominiums located about four blocks to the north are visible from the project area. To the northeast, at 886 Broadway, is Alfred's restaurant. Further to the east on Broadway (where traffic enters and exists the tunnel) is the Jean Parker public Elementary School. The City's District Health Center No. 4 is directly east across Mason Street at 1490 Mason. Public health and medical services are provided primarily to low and moderate income clients at the facility. To the south, on the eastern side of Mason Street are residential uses, a preschool program, an Epispocal Church, and a 92 unit elderly housing complex at 990 Pacific and Mason owned by the San Francisco Housing Authority. The western side of Mason Street is entirely residential, developed with two and three family flats and small apartment buildings.

To the west, the Russian Hill neighborhood is generally one and two family dwellings. Mason Street is a transitional border between the more varied and intensive land uses to the east in the Broadway/North Beach commercial area and Chinatown, and the less varied and intensely developed Russian Hill residential area to the west and northwest.

The proposed project would result in an intensification of residential uses and of facilities serving seniors. These issues will be discussed further in the EIR.

2. Visual Quality. Could the project:

	Yes	No	Discussed
*a. Have a substantial, demonstrable negative aesthetic effect.		X	X
b. Substantially degrade or obstruct any scenic view or vista now observed from public areas?		X	X
c. Generate obtrusive light or glare substantially impacting other properties?		X	X

The EIR will discuss potential visual impacts of the project including its appearance and scale in relation to other buildings in the area. The EIR will also discuss the project's effects on existing views of Telegraph Hill, the Bay and downtown from public streets and sidewalks and from nearby residences. The effect on views of the Guadalupe Church from the northbound cable car route will be discussed. The project's relationship to the policies and objectives of the Urban Design Element of the Master Plan will be discussed in the EIR.

The project would not cause any obtrusive light or glare that would impact other properties. The EIR will not discuss glare impacts of the project.

3. Population. Could the project:

	Yes	No	Discussed
*a. Induce substantial growth or concentration of population?		X	X

*Derived from State EIR Guidelines, Appendix G, normally significant effect.

*b. Displace a large number of people (involving either housing or employment)?		X	
*c. Create a substantial demand for additional housing in San Francisco, or substantially reduce the housing supply?		X	

The proposed project would contain seven one-bedroom units and 63 studio units and would house about 77 elderly and/or handicapped persons at full occupancy.

A resident manager and one office staff would be employed on-site. The senior center would serve lunch to a maximum of 150 persons on a daily basis. A portion of the building's residents would chose to participate in the lunch program, so fewer than 150 people from outside the building would come for lunch. Elderly persons would be attracted to the site for other services and activities of the senior center such as classes, medical services and social events. The senior center's administrative offices would be off-site. Senior center services staff such as a social worker, nurse and recreation worker would probably be on location at various times. The lunch program would require about three paid staff and two to four volunteers for several hours each day around the noon hour.

Because the site is currently vacant, no people or jobs would be displaced and no buildings would be demolished. Employment and housing effects will require no further discussion in the EIR.

4. Transportation/Circulation. Could the project:

	Yes	No	Discussed
*a. Cause an increase in traffic which is substantial in relation to the existing traffic load and capacity of the street system?		X	X
b. Interfere with existing transportation systems, causing substantial alterations to circulation patterns or major traffic hazards?		X	X

*Derived from State EIR Guidelines, Appendix G, normally significant effect.

c. Cause a substantial increase in transit demand which cannot be accommodated by existing or proposed transit capacity?		X	X
d. Cause a substantial increase in parking demand which cannot be accommodated by existing parking facilities?		X	X

The proposed project would cause increases in traffic, transit and parking demand. The primary effect of the project would be added traffic at the Broadway and Mason intersection. The EIR will discuss traffic increases and movements as they relate to the operation of the Broadway/Mason intersection. The EIR will analyze trips generated by project residents, visitors, and senior center staff and users, and the potential impact of project traffic on the operation of the Mason/Powell cable car line.

The project would provide off-street parking for 12 vehicles. It would not displace any existing on-or off-street parking. The EIR will analyze the project parking demand compared to spaces provided by the project and in relation to the neighborhood parking supply.

Cumulative impacts on traffic circulation patterns, transit, pedestrians and parking will be discussed in the EIR.

The effect of traffic from construction vehicles and equipment on the operation of the Broadway/Mason intersection, on traffic within the Broadway Tunnel and on Broadway Street will be discussed in the EIR.

5.Noise. **Could the project:**

	Yes	No	Discussed
***a. Increase substantially the ambient noise levels for adjoining areas?**		X	X
b. Violate Title 25 Noise Insulation Standards if applicable?		X	X
c. Be substantially impacted by existing noise levels?		X	X

The noise environment of the project site is dominated by traffic within the tunnel and by traffic and cable car operations on Mason Street. The Environmental Protection Element of the San Francisco Master Plan indicates a day-night average noise level of 70 Ldn on Mason Street adjacent to the site in 1974./1,2/ In 1985 day/night average noise level (Ldn) was estimated to be about 73 dB./3/ Along Mason Street the major noise source is the cable car system. The noise level from the operation of the cable system itself was measured at 61 to 67 dBA at the building facade line along Mason Street near the project site./4/ This is a continuous noise level while the cable car system is in operation from about 6:00 a.m. to 1:00 a.m. daily. Maximum noise levels of 80-81 dBA at the project's Mason Street property line are generated when the cable cars pass the site./3/

On Broadway, in front of the Guadalupe Church, the major source of existing noise is from traffic going through the Broadway Tunnel. The average noise level was measured at 68 dB and the Ldn is estimated to be about 70 dB/3/. Residents have reported higher noise levels from auto accidents in the Tunnel. The proposed project's foundation would completely seal the current opening to the Tunnel, and thus would block the transmission of noise from within the Tunnel to the neighborhood.

Project Operation

Project operation would not result in perceptibly greater noise levels than those existing in the area. The amount of traffic gererated by the project during any hour of the day, and cumulative traffic increases at the time of project completion, would cause traffic noise levels to increase by one dBA or less. To produce a noticeable increase in environmental noise, a doubling of existing traffic volume would be required; traffic increases of this magnitude would not occur with anticipated cumulative development including the project./5/

The project would be required to comply with the san Francisco Noise Ordinance, San Francisco Police Code Section 2909, "Fixed Source Noise Levels," which regulates mechanical equipment noise. The project site and surrounding area are within a RM-2 district. In this district, the ordinance limits equipment noise levels at the property line to 60 dBA between 7 a.m. and 10 p.m. and 55 dBA between the hours of 10 p.m. and 7 a.m. Noise due to building operation and project generated traffic will not be discussed further in the EIR.

The Environmental Protection Element of the Master Plan contains guidelines for determining the compatibility of various land uses with different noise environments. For residential uses, the guidelines recommend no special noise control measures in an exterior noise environment up to an Ldn of 60 dBA. For noise levels of 65 dBA and above, the guidelines recommend an analysis of noise reduction requirements and inclusion of noise insulation features in the building design.

Title 25 of the California Government Code requires that an acoustical report be prepared for all new multi-family housing projects located in areas where the exterior Ldn exceeds 60 dB, and that interior noise levels in such projects not exceed 45 dB. The project sponsor would retain an acoustical consultant to prepare the appropriate acoustical analysis. In order to insure compliance with Title 25 and the Master Plan, a copy of this report would be submitted with the application for a building permit.

The acoustical consultant will also recommend appropriate measures such as plantings to reduce the noise level in the project's front plaza to acceptable levels for outdoor areas according to HUD's standards. These issues will not be discussed further in the EIR.

Construction Noise

Project construction would take place over about 18 months, and would increase noise levels in surrounding areas. Construction noise levels would fluctuate depending on construction phase, equipment type and duration of use, distance between noise source and listener and presence or absense of barriers between noise source and listener.

Preliminary recommendations of the project sponsor's structural engineer indicate that driven piles would not be used to support the center foundation posts for the building. It is anticipated that the building would be constructed with a steel frame which would require the use of impact tools. Impacts of construction noise will be discussed in the EIR.

NOTES - Noise

/1/ Environmental Protection Element of the San Francisco Master Plan, Adopted, May 24, 1983.

/2/ dBA is a measure of sound in units of decibels (dB). The "A" denotes the A-weighted scale, which simulates the response of the human ear to various frequencies of sound.

Ldn, the day-night average noise level, is a noise measurement based on human reaction to cumulative noise exposure over a 24-hour period, taking into account the greater annoyance of nightime noises; noise between 10 p.m. and 7 a.m. is weighted 10 dBA higher than day time noise.

/3/ Pineview Senior Housing Noise Assessment by Charles M. Salter Associates, Inc., Decemeber 23, 1985.

/4/ Cable Car System Noise Reduction Study for the Public Utilities Commission, Final Report, February, 1986 by Wilson, Ihrig & Associates, Inc.

/5/ See Downtown Plan EIR (Vol. 1) Continuous Section IV.E. generally and Section IV.J., pp. IV.J.8-18. Increases of 1 dBA or less in environmental noise are not noticeable by most people outside a laboratory situation (National Academy of Sciences, Highway Research Board, Research Report No. 117 (1971). (See also FHWA Highway Traffic Noise Prediction Model, Report #FHWA-RD-77-108, December 1978, p.8, regarding doubling of traffic volumes producing increases of 3 dBA or more, which are noticed by most people).

6. Air Quality/Climate Could the project:

	Yes	No	Discussed
*a. Violate any ambient air quality standard or contribute substantially to an existing or projected air quality violation?	X		X
*b. Expose sensitive receptors to substantial pollutant concentrations?			X
c. Permeate its vicinity with objectionable odors?		X	X
d. Alter wind, moisture or temperature (including sun shading effects) so as to substantially affect public areas, or change the climate either in the community or region?		X	X

Project construction would not involve excavation or demolition, would not involve burning of any materials and would not create objectionable odors. Construction activities would temporarily affect local air quality by increasing total suspended particulates (TSP). The project sponsor has agreed to a mitigation measure to reduce dustfall and particulates. (see page 30) Construction air quality impacts will not be discussed further in the EIR.

*Derived from State Guidelines EIR Guidelines. Appendix G, normally significant effect.

Operation of the structure would result primarily in natural gas combustion emissions from the roof top which would be insignificant because natural gas is clean burning compared to other fuels and has a comparatively rapid dilution rate.

Project generated traffic volumes would not produce an increase in air pollutant concentrations which would be large enough to measure or model accurately at either the local or regional scales. Project generated emissions would be less than the threshold established for potentially significant air quality effects by the Bay Area Air Quality Management District. These impacts will not be discussed further in the EIR.

The EIR will analyze the potential impacts on air quality within the tunnel and at the tunnel entrances that could be caused by covering the existing open air space at the project site. The EIR will discuss the effects on nearby sensitive uses: the Health Center and the elementary school.

The proposed project would extend only a few floors above surrounding buildings and would have a complex geometry, including rounded forms, setbacks and cutouts. It is not expected that the project would significantly affect wind accelerations at pedestrian levels. This issue will not be discussed further in the EIR.

Shadows

Description of Shadow Analysis:

Shadow patterns for existing and proposed buildings in the project area were analyzed for 10:00 a.m., noon, and 3:00 p.m. for the four seasons: during winter and summer solstices when the sun is at its lowest and highest and during the spring and fall equinoxes when the sun is at its midpoint. Shadow diagrams are on file at the Department of City Planning, 450 McAllister Street, San Francisco and are available for public review.

The analysis includes shadows cast on streets, sidewalks, pedestrian areas, and open space in the area (including the Church steps, the project's front plaza and the nearby mini-park) potentially affected by the proposed project.

December 21 (PST):

At 10:00 a.m. on December 21st, the project would add new shadows along Broadway adjacent to and opposite the site. The steps of the Church would be virtually completely shadowed by the project. New shadow would be added to Broadway and its north sidewalk from the church steps extending west about 100 feet.

At noon on December 21st the proposed building would add new shadow to Broadway and the north sidewalk directly opposite the project site for a distance of about 125 feet. The Church steps would be completely shadowed by the proposed building. A portion of the project's front plaza along Broadway would also be shadowed by the project itself.

At 3:00 p.m. on December 21st, the project would add to existing shadows on Broadway and Mason Streets. The Church steps and about two-thirds of the street and sidewalk frontage along the Church is presently shadowed by existing structures.

March 21 (PST):

At 10:00 a.m. on March 21st, the project would add new shadows to Broadway and to about two-thirds of the north sidewalk opposite the site. The Church steps would not be shadowed at this time by the proposed project.

At noon on March 21st, the project would shade the street and north sidewalk of Broadway directly opposite the site. The Church steps would not be shaded. The northwestern portion of the project's front plaza would be shaded by the building itself.

At 3:00 p.m. on March 21st, the project would add new shadow to the Broadway street and a portion of the Broadway and Mason intersection. The steps of the Church would not be shadowed. Most of the sidewalk on the north of Broadway would not be shadowed. Almost all of the project's front plaza would be shadowed by the building itself.

June 21 (PST):

At 10:00 a.m. on June 21st, the project would add new shadow to a portion of the southern side of Broadway Street adjacent to the site. There would not be any shadow on the Church steps or the northern sidewalk on Broadway.

At noon on June 21st, the project would add new shadow to a portion of the southern side of Broadway adjacent to the site.

At 3:00 p.m. on June 21st, the project would add new shadow to a narrow strip on the southern edge of Broadway adjacent to the site. About one-half of the project's front plaza would be shadowed by the project itself.

September 21 (PDT):

At 10:00 a.m. on September 21st, the project would add new shadow to Broadway adjacent to the site extending for about 100 feet. A portion of the sidewalk in front of the Church would be shadowed. The Church steps would not be shadowed.

At noon on September 21st, the project would add new shadows to Broadway adjacent to the site. A portion of the sidewalk on the northern side of Broadway extending for about 100 feet to the west from the center of the Church would be shadowed. There would be no shadow on the Church steps. A portion of the northwestern area of the project's front plaza would be shaded by the building itself.

At 3:00 p.m. on September 21st, the project would add new shadows along Broadway adjacent to and opposite the site for about 150 feet to the west from the intersection of Broadway and Mason Streets. A portion of the sidewalk on the northern side of Broadway opposite the site would be shadowed. There would not any shadow on the Church steps. Most of the project's front plaza would be shadowed by the building itself.

In summary, at various times new shadows would be cast on the Church steps, on the sidewalk in front of the Church and on Broadway and Mason Streets adjacent to the project site. Shadow impacts on the Church steps would occur during the morning and noon hours from fall to spring. The period of greatest shadow impact would be in the winter months when cold winds, clouds and rain would often discourage the use of the steps and sidewalk as a gathering spot for the congregation. The proposed project's front plaza would provide new open space, accessible to the public, that would not be shadowed during the early to mid-morning hours when the Church services are held.

The proposed building would add some new shadow to portions of the Jean Parker School playground for a few minutes in the late afternoon near sunset during the winter months (October through February). The school playground is not subject to Proposition K. The Health Center and buildings directly to the west of the school on Broadway currently shadow portions of the playground during the above times.

Proposition K

In June, 1984, the voters of the City and County of San Francisco approved Proposition K, the Park Shadow Ban initiative ordinance prohibiting the issuance of building permits for structures that would shade property under the jurisdiction of or designated to be acquired by, the Recreation and Park Department unless the City Planning and Recreation and Park Commissions determine that such shade would have an insignificant adverse impact on the use of such property.

The nearest property subject to Proposition K is the mini-park between Broadway and Pacific adjoining the Ping Yuen apartments about one and one-half blocks to the east of the site. An analysis of the proposed building's maximum extent of shadow is on file at the Department of City Planning, 450 McAllister Street, San Francisco and is available for public review. The project would add no new shadow to the mini-park from one hour after sunrise to one hour before sunset year round.

The small mini-park located immediately to the west of the ventilation building is also not subject to Proposition K. The property is under the jurisdiction of the Department of Public Works, although it is maintained by the Recreation and Park Department. However, the height of the ventilation building would prevent the proposed project from casting any shadow on the mini-park. Shadows will not be discussed further in the EIR.

7. Utilities/Public Services. Could the project:

	Yes	No	Discussed
*a. Breach published national, state or local standards relating to solid waste or litter control?		X	
*b. Extend a sewer trunk line with capacity to serve new development?		X	
c. Substantially increase demand for schools, recreation or other public facilities?		X	
d. Require major expansion of power, water, or communications facilities?		X	

The proposed project would increase demand for and use of public services and utilities on the site, but not in excess of amounts expected and provided for in the project area. The providers of water and sewer services have been contacted and have responded that they have adequate capacity to serve the project and would not require additional personnel or equipment. This issue will not be discussed further in the EIR.

*Derived from State EIR Guidelines, Appendix G, normally significant.

8. Biology. Could the project:

	Yes	No	Discussed
*a. Substantially affect a rare or endangered species of animal or plant, or the habitat of the species?		X	X
*b. Substantially diminish habitat for fish, wildlife or plants, or interfere substantially with the movement of any resident or migratory fish or wildlife species?		X	
c. Require removal of substantial numbers of mature, scenic trees?		X	

The project site is totally covered by pavement. There are no rare or endangered species of plant or animal habitats on site. These matters do not require further discussion in the EIR.

9. Geology/Topography. Could the project:

	Yes	No	Discussed
*a. Expose people or structures to major geologic hazards (slides, subsidence, erosion and liquefaction)?		X	X
b. Change substantially the topography or any unique geologic or physical features of the site?		X	X

The project site is on the lower eastern slopes of Russian Hill, the elevation ranges form 140 to 160 feet, San Francisco, City Datum. /1/ Soils at the site are composed of fill and slide debris underlain by bedrock consisting of Shale and thin Bedded Sandstone. Test borings performed for the original Broadway Tunnel investigation suggested that the depth of fill and slide debris could be about 20 to 30 feet thick at the site./2/

*Derived from State EIR Guidelines, Appendix G, normally significant.

Excavation would not be required for the projects foundation. The proposed structure would be supported by the existing Tunnel retaining walls and a center row of columns supported by drilled concrete caissions. /3/

The closest active faults to San Francisco are the San Andreas Fault, about 9 miles southwest of the site and the Hayward and Calaveras Faults, about 15 and 30 miles east of the site respectively. The project area would experience Strong (Intensity Level D, general but not universal fall of brick chimneys, cracks in masonry and brick work) groundshaking during a major earthquake./4/

A preliminary geotechnical and structural evaluation of the feasibility of constructing the proposed building using the existing tunnel retaining walls for the foundation support was prepared. The report concludes that, based on the information available, the project is feasible from a structural engineering standpoint./2/ (A copy of the report is available for public review at the Department of City Planning). Further detailed soil investigations and testing of the existing tunnel, bridge and retaining wall structures would be required. The project sponsor has agreed to construct the project in accordance with the recommendations of this investigation with regard to the foundation and structure; as evidence of compliance, a copy of this report would be submitted with the Building Permit application. (See Mitigation Measures, page 30). The building must meet current seismic engineerng standards of the San Francisco Building Code which include earthquake-resistant design and materials. The Code is designed to allow for some structural damage to buildings but not collapse during a major earthquake, (see also Mitigation Measures, p. 30 for the project's emergency response plan).

These issues will not require further discussion in the EIR.

NOTES - GEOLOGY/TOPOGRAPHY

/1/ San Francisco City Datum establishes the City's "0" point surveying purpose at approximately 8.6 feet above mean sea level.

/2/ Letter from Geo/Resource Consultants, Inc. dated December 27, 1985.

/3/ Letter from Frankie Lee,, C.E. dated June 30, 1986.

/4/ URS/John A. Blume and Associates, San Francisco Seismic Safety Investigation, 1974. Groundshaking intensities that would result from a major earthquake were projected and classified on a five-point scale ranging from E (Weak) through A (Very Violent).

10. Water. Could the project:

	Yes	No	Discussed
*a. Substantially degrade water quality, or contaminate a public water supply?		X	

*Derived from State Guidelines, Appendix G, normally significant effect.

*b. Substantially degrade or deplete ground water resources, or interfere substantially with ground water recharge?		X	
c. Cause substantial flooding, erosion or siltation?		X	

There is no surface water at the site. The site is currently impervious, covered by the paved roadway and Tunnel retaining walls. The site would continue to be covered by impervious surfaces with construction of the proposed project. Runoff would continue to drain into the combined City storm/sewer system. These issues will not be discussed further in the EIR.

11. **Energy/Natural Resources.** Could the project:

	Yes	No	Discussed
*a. Encourage activities which result in the use of large amounts of fuel, water, or energy or use these in a wasteful manner?		X	X
b. Have a substantial effect on the potential use, extraction, or depletion of a natural resource?		X	X

New buildings in San Francisco, are required to conform to energy conservation standards specified by Title 24 of the California Administrative Code. Documetation showing compliance with these standards is submitted with the application for the building permit and is enforced by the Bureau of Building Inspection.

Table 1, page 37, shows the estimated operational energy which would be used by the project. Project demand for electricity during PG&E's peak electrical load periods, July and August afternoons, would be about 250-300 kW, an estimated .0019% of PG&E's peak load of 16,000 M W. /1/. Project demand for natural gas during PG&E's peak natural gas load periods, January mornings, would be 10-12 million Btu per day, or about .0003% of PG&E's peak load of about 3.7 billion cu.ft. per day./1/ Annual and peak daily electricity and natural gas consumption are shown in Figures 5 and 6, p. 38-39.

*Derived from State Guidelines, Appendix G, normally significant effect.

Projections of electrical use for growth expected to occur outside of the C-3 district in San Francisco indicate an increase of about 75 million KWh per year between 1984 and 2000. Natural gas consumption is expected to be 35 billion cu.ft. annually by 2000./2/

Increased San Francisco energy demands to the year 2000 would be met by PG&E from nuclear sources, oil and gas facilities, hydroelectric and geothermal facilities, and other sources such as cogeneration, wind and imports. PG&E plans to continue receiving most of its natural gas from Canada and Texas under long-term contracts. Energy use and conservation will not be discussed further in the EIR.

NOTE - ENERGY

/1/ San Francisco Department of City Planning, Downtown Plan Environmental Impact Report (EIR), EE81.3, certified October 18, 1984, Vol. 1 pp.IV.G.3-4.

/2/ Ibid., p.IV.G.12.

12. Hazards. Could the project:

	Yes	No	Discussed
*a. Create a potential public health hazard or involve the use, production or disposal of materials which pose a hazard to people or animal or plant populations in the area affected?		X	
*b. Interfere with emergency response plans or emergency evacuation plans?		X	X
c. Create a potentially substantial fire hazard?		X	X

The project would not create a potential public health hazard through the production or disposal of harmful materials. An evacuation and emergency response plan for the building's occupants would be developed as part of the proposed project (see D. Mitigation Measures, page 30). The project's emergency plan would be coordinated with the City's emergency Planning activities.

*Derived from State EIR Guidelines, Appendix G, normally significant effect.

Presently emergency personnel can access the Tunnel from the project site using ropes or portable ladders. There is no stairway or vehicular access at the site into the Tunnel.

Construction of the proposed project would remove this means of access to the Tunnel in event of an emergency. However, this would not significantly interfere with emergency response since the site is located near (about 200 feet) the eastern entrance to the Tunnel. Also, emergency response agencies could make arrangements to have access to the existing stairways in each ventilaton building in order to have alternative emergency access to the tunnel roadway.

The project would not create a substantial fire hazard because it would incorporate more extensive fire protection measures than most buildings in the area to comply with more stringent code standards now in effect. The proposed building would be constructed of steel or reinforced concrete framing on a concrete slab. An interior sprinkler system would also be required. The residents of the building would not be subjected to a potentially substantial fire hazard from fire or explosion within the Tunnel because of the fire-proof construction materials and because the building would be totally sealed off from the Tunnel.

13. Cultural. Could the project:

	Yes	No	Discussed
*a. Disrupt or adversely affect a prehistoric or historic archaeological site or a property of historic or cultural significance to a community, ethnic or social group; or a paleontological site except as a part of a scientific study?		X	X
*b. Conflict with established recreational, educational, religious or scientific uses of the area?		X	X
c. Conflict with preservation of any buildings? of City landmark quality?		X	X

*Derived from State EIR Guidelines, Appendix G, normally significant effect.

Immediately north of the project site at 908 Broadway is the Catholic church "Our Lady of Guadalupe." The present structure was built of reinforced concrete in 1912 on the basement of the original 1880 church which had survived the 1906 earthquake but was destroyed in the fire. The Guadalupe Church has traditionally been an important religious center for the hispanic population of both San Francisco and the Bay Area. It was one of the earliest hispanic parishes in the City. The church was rated "2" (on a scale from alow of "0" to a high "5") in the 1976 Architectural Inventory by the Department of City Planning. Architectural and historical resources will be discussed in the EIR.

The excavation required for foundations would occur in existing disturbed soils so there would be limited potential for encountering cultural resources during construction. No known archaeological resources exist on or near the site. However, the project sponsor has included a mitigation measure as part of the project which addresses this potential impact (see D., Mitigation Measures, page 30). Issues associated with cultural and archaeological impacts require no further discussion in the EIR.

C. OTHER. Could the project:

	Yes	No	Discussed
*a. Require approval of permits from City Departments other than DCP or BBI, or from Regional, State or Federal Agencies?		X	

D. MITIGATION MEASURES.

	Yes	No	N/A	Discussed
1. If any significant effects have been identified, are there ways to mitigate them?			X	
2. Are all mitigation measures identified above included in the project?	X			

MITIGATION MEASURES INCLUDED AS PART OF THE PROJECT

*Derived from State Guidelines, Appendix G, normally significant effect.

1. The project sponsor would retain an acoustical consultant to design noise insulation measures to ensure that the building would comply with Title 25 and the Master Plan. The acoustical analysis would also recommend appropriate measures to reduce noise levels in the building's front plaza to levels which are acceptable to HUD. A copy of this report would be submitted with the building permit application.

2. The project sponsor would require the general contractor to maintain and operate construction equipment so as to minimize exhaust emissions of TSP and other pollutants, by such means as a prohibition on idling motors when equipment is not in use or when trucks are waiting in queues, and implementation of specific maintenance programs (to reduce emissions) for equipment that would be in frequent use for much of a construction period.

3. A detailed foundation and structural design study would be conducted for the building by a California-licensed structural engineer and a geotechnical consultant. The project sponsor would follow the recommendations of these studies during the final design and construction of the project.

4. An evacuation and emergency response plan would be developed by the project sponsor or building management staff, in consultation with the Mayor's Office of Emergency Services, to ensure coordination between the City's emergency planning activities and the project's plan, and to provide for building occupants in the event of an emergency. The project's plan would be reviewed by the Office of Emergency Services and implemented by building management insofar as feasible before issuance of final building permits by the Department of Public Works.

5. Should evidence of cultural or historic artifacts of significance be found during project excavation, the Environmental Review Officer (ERO) and the President of the Landmark's Preservation Advisory Board would be notified immediately, and any excavation which could damage such artifacts halted.

The project sponsor would select the archaeologist or other expert to help the Office of Environmental Review determine the significance of the find and whether feasible measures, including appropriate security measures, could be implemented to preserve or recover such artifacts. The ERO would then recommend specific mitigation measures, if necessary.

Copies of reports prepared according to this mitigation measure would be sent to the California Archaeological Site Survey Office at Sonoma State University. Excavation or construction that might damage the discovered cultural resources would be suspended for a maximum of four weeks (cumulatively for all instances that the ERO has required a delay in excavation or construction) to permit inspection, recommendation and retrieval, if appropriate.

E. ALTERNATIVES

Alternatives to the project include the following:

1. No Project: The site would remain in its existing condition.

2. Code Complying/Reduced Density Alternative: 35 apartments for the elderly in a 40 foot building, meeting all requirements of the City Planning Code and not involving variance or Conditional Use authorization.

3. Larger Site Alternative: 70 apartments for the elderly and the senior center on a larger site made by combining the Tunnel air space and the adjoining privately owned vacant lot. Replacement parking would be provided on-site for Alfred's Restauant.

4. Neighborhood Park Alternative: A city park would be developed on the Tunnel air rights; no housing would be built at the site.

These alternatives will be more fully described and analyzed in the EIR.

F. MANDATORY FINDINGS OF SIGNIFICANCE

	Yes	No	Discussed
1. Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory?		X	
2. Does the project have the potential to achieve short-term, to the disadvantage of long-term, environmental goals?		X	
3. Does the project have possible environmental effects which are individually limited, but cumulatively considerable? (Analyze in the light of past projects, other current projects, and probable future projects.)		X	
4. Would the project cause substantial adverse effects on human beings, either directly or indirectly?		X	
5. Is there a serious public controversy concerning the possible environmental effect of the project?	X		

G. ON THE BASIS OF THIS INITIAL STUDY:

___ I find the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared by the Department of City Planning.

___ I find that although the proposed project could have a significant effect on the environment, there WILL NOT be a significant effect in this case because the mitigation measures, numbers ___, in the discussion have been included as part of the proposed project. A NEGATIVE DECLARATION will be prepared.

X I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.

Barbara W. Sahm

BARBARA W. SAHM
Environmental Review Officer

for

DEAN L. MACRIS
Director of Planning

BWS:CRS:eh
CRS:1

DISTRIBUTION LIST

STATE AND FEDERAL AGENCIES

Department of Housing and Urban Development

REGIONAL AGENCIES

Bay Area Air Quality Management District

Calif. Dept. of Transportation Bus. & Trans. Agency

LIBRARIES

San Francisco Public Library (Main & Branch)

MEDIA

East/West Newspaper
San Francisco Bay Guardian

San Francisco Chronicle
San Francisco Progress

San Francisco Examiner

GROUPS & INDIVIDUALS

Chinatown Resource Center
Chinese Hospital
Old St. Mary's Housing Committee
On Lok Senior Health Services
Ping Yuen Tenant Asso.
Nob Hill Neighbors
Russian Hill Neighbors
Telegraph Hill Dwellers
North Beach Neighbors
Heritage
Archdiocese of San Francisco
Chinese American Citizens Alliance
Council of Community Housing Organizations
Bay Area Council

CITY AND COUNTY OF SAN FRANCISCO

Bureau of Bldg. Inspection
San Francisco City Attorney's Office
Landmarks Preservation Advisory Board
Mayor's Office of Housing & Economic Development
Mayor's Office of Community Development
Public Utilities Commission
Public Utilities Commission Energy Conservation
Recreation & Park Dept.
Bureau of Engineering - Street and Highways
Dept. of Public Works Mechanical Engineering Division
Department of Public Works Traffic Engineering Division
Department of Public Works Bureau of Building Repair
Municipal Railway Planning Division
San Francisco Real Estate Dept.
San Francisco Water Department
Northeast Health Center #4

ADJACENT PROPERTY OWNERS

Janes Lem & Alfred Lum
Rose Bacchini
Yin Chow & Ngook Bec
Philip & Sophia Ng
Bing & Lan Yee
Shoong & Rose Chin
Florence Chow
Shiu Ng & Po Pun
Raymond & Lorraine Chow
Gladys Wong
Kay & Ester Jue
Albert & Suet Ying Quan
Donald Chinn & Hing Lee
Lai Ting Woo Yuen
Low Yow & foon Sue
Bick Tam & Wei Kam
Kow Heong Wong

GROUPS & INDIVIDUALS

Stephen Kendrick & Catherine Lewis
Broadway Tunnel Park Committee
Calvin Lee
Vesta Kirby
Nancy Roca
Marie Louise Anzak
Nielson Rogers
Rev. Donald C. McDonald
Manager, Alfred's Restaurant
Patrica Wing
Gladys Wong
Zena Sailer
Calvin Chin
Carl Gastman
Joan Burrows
Genevive Chan
R. Glen Koerner
Beatrice Borales
Donald Kropp
Peter Geragty
Libby Montagne
Jerome Chupe
Kathryn Ringold
Dora & Claire Fraschina
Alan & Joanna Nichols
Eileen Le Blond
C.P. Piano
Joe & Daisy Lem
Alessandro Baccari

TABLE 1

PINEVIEW ESTIMATED PROJECT ENERGY USE/a/

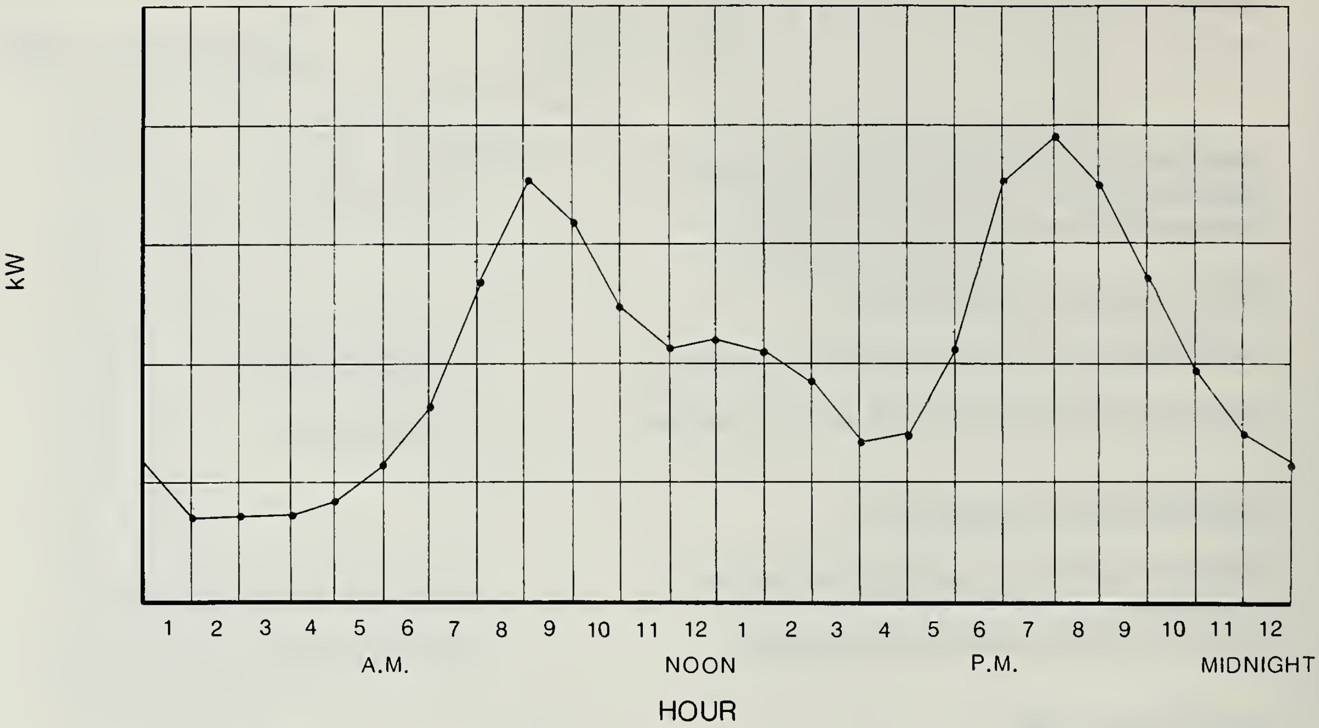
Fabrication and transportation of building materials, worker transportation, site development and building construction	23×10^9 Btu (4,690 barrels of oil)
Daily Natural Gas Consumption	
Estimated natural gas consumption per unit	240,000 Btu/b/
Estimated peak daily natural gas consumption	167 Therms
Monthly Electric Consumption	
Estimated electrical consumption per unit	317 kWh (3.2×10^6 Btu)/c/
Estimated total electrical consumption	22,200 kWh (227×10^6 Btu)
Annual Consumption	
Estimated total annual natural gas consumption	60,900 Therms (6.1×10^9 Btu)
Estimated total annual electrical consumption	266,000 kWh (2.7×10^9 Btu)
Connected kilowatt load	500-800 kilowatts
Estimated total annual energy consumption	8.8×10^9 Btu (1,575 barrels of oil)

/a/ Energy use calculations based on data contained in Energy Supply and Consumption Patterns Trends and Prospects, 1974-1985 (City and County of San Francisco, 1980) and Downtown Plan EIR.

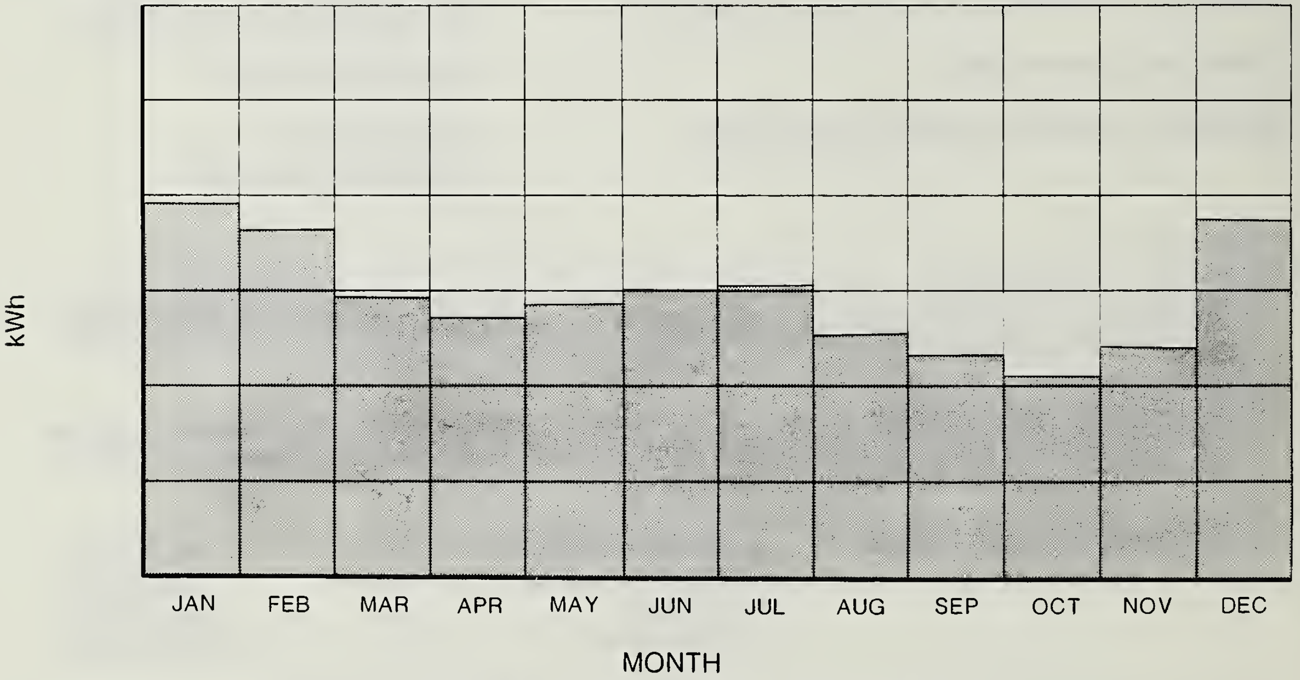
/b/ Btu (British thermal unit): A standard unit for measuring heat. Technically, it is the quantity of heat required to raise the temperature of one pound of water one degree (1°) Fahrenheit (251.97 calories) at sea level.

/c/ Energy Conversion Factors:

one gallon gasoline = 125,000 Btu
one kilowatt (kw) = 10,239 Btu
one therm = 100,000 Btu
one barrel oil = 5,600,000 Btu



PEAK DAY ELECTRICAL LOAD DISTRIBUTION (JANUARY)

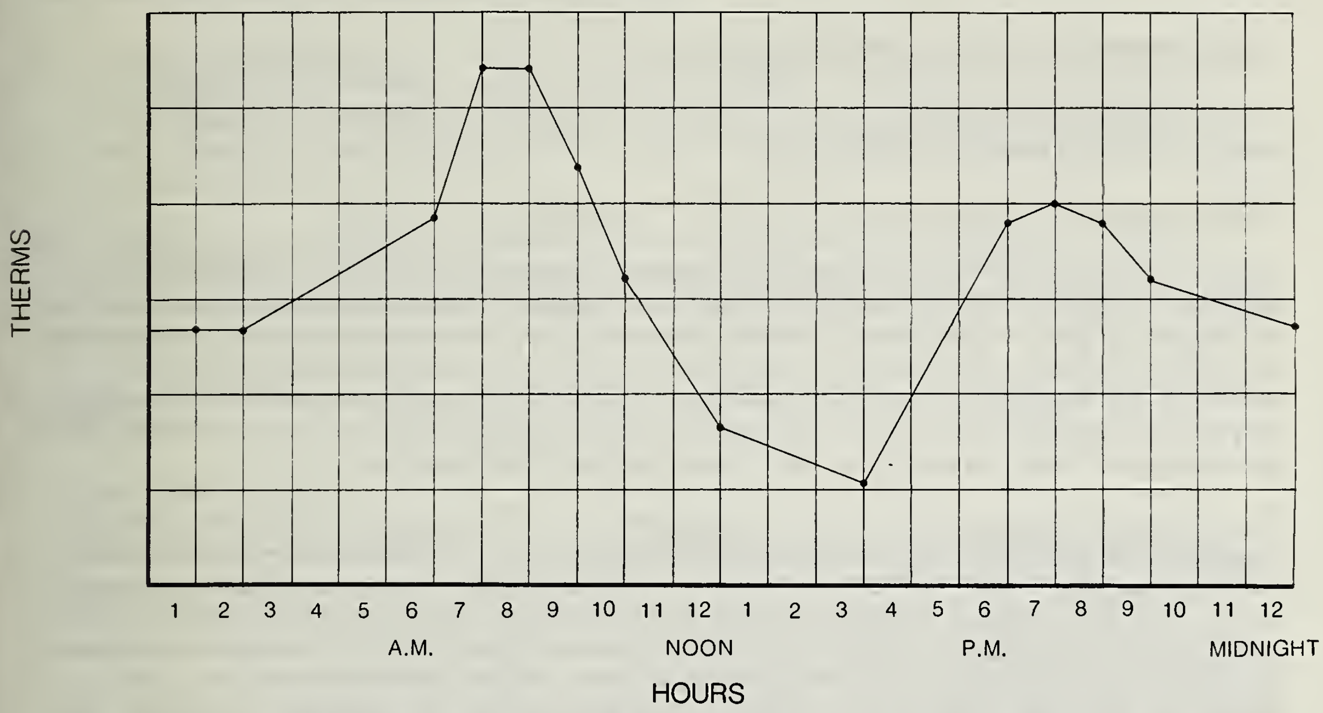


ANNUAL ELECTRICAL CONSUMPTION

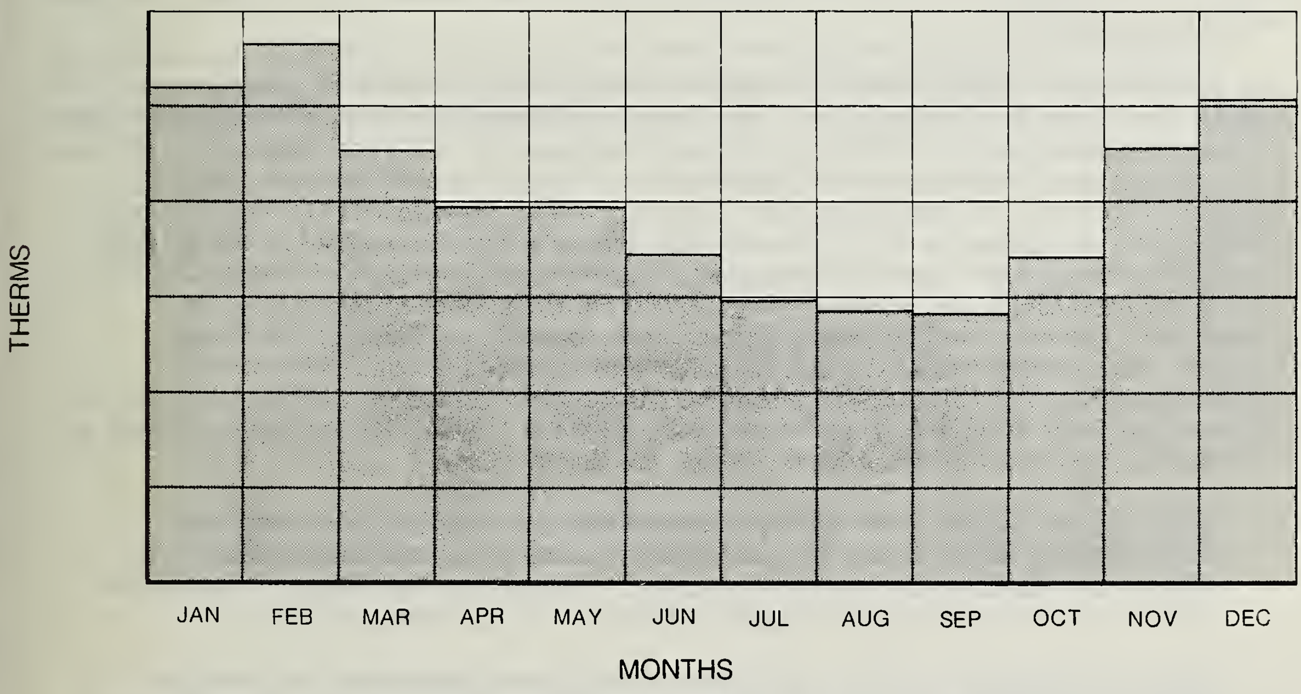
PINEVIEW

PROJECTED ELECTRICAL DISTRIBUTION CURVES

SOURCE: ESA



PEAK DAY HOURLY DEMAND FOR NATURAL GAS (FEBRUARY)



ANNUAL NATURAL GAS CONSUMPTION

PINEVIEW

NATURAL GAS DISTRIBUTION CURVES

SOURCE: ESA

APPENDIX B: ARCHITECTURAL RESOURCES

ARCHITECTURAL EVALUATION SURVEYS

The architectural ratings discussed in the text of this report represent the results of several separate architectural surveys.

SAN FRANCISCO DEPARTMENT OF CITY PLANNING INVENTORY

Between 1974 and 1976, the San Francisco Department of City Planning conducted a citywide inventory of architecturally significant buildings. An advisory review committee of architects and architectural historians assisted in the final determination of ratings for the 10,000 buildings, the results of which were entered in an unpublished 60-volume record of the inventory. The rated buildings are also represented on a set of color-coded maps which identify the location and relative significance of each building surveyed. The inventory and maps are on file at the Department of City Planning.

The inventory assessed the architectural significance of the surveyed structures from the standpoint of overall design and particular design features. Both contemporary and older buildings were included, but historical associations were not considered. Each building was given two numerical ratings, for architectural quality and for overall architectural significance, urban design context, and environmental significance. The latter rating is referred to in this report. The ratings ranged from a low of "0" to a high of "5". The architectural survey resulted in a listing of the best 10% of San Francisco's buildings. In the estimation of the inventory participants, buildings rated "3" or higher represent approximately the best 2% of the City's architecture.

HERITAGE SURVEY

The Foundation for San Francisco's Architectural Heritage, through its consultants, Charles Hall Page & Associates, Inc., conducted an architectural and historical survey of all downtown structures. In 1979, the original inventory results were published in the book Splendid Survivors (Foundation for San Francisco's Architectural Heritage, Splendid Survivors, California Living Books, San Francisco, 1979). Subsequent Heritage surveys evaluated all structures in the C-3 zoning districts in areas not covered in the Splendid Survivors survey ("San Francisco Downtown Architectural Survey: C-3 Zoning District, Final Evaluated List", December 1, 1982), and structures South of Market and in Chinatown. The expanded inventory has not been formally published by Heritage. Criteria considered in rating the buildings for both surveys include Architectural Significance, Historic Context and Negative Alterations. Summary ratings from "A" to "D" were assigned to each building on the basis of these scores. The summary ratings, as described on pp. 12-13 of Splendid Survivors, are listed below:

A. "Highest Importance. Individually the most important buildings in downtown San Francisco, distinguished by outstanding qualities of architecture, historical values, and relationship to the environment. All A-group buildings are eligible for the National Register, and of highest priority for City Landmark status."

B. "Major Importance. Buildings which are of individual importance by virtue of architectural, historical, and environmental criteria. These buildings tend to stand out for their overall quality rather than for any particular outstanding characteristics. B-group buildings are eligible for the National Register, and of secondary priority for City Landmark status."

The Landmarks Preservation Advisory Board does not distinguish between "A" rated and "B" rated buildings for purposes of preservation.

C. "Contextual Importance. Buildings which are distinguished by their scale, materials, compositional treatment, cornice and other features. They provide the setting for more important buildings and they add visual richness and character to the downtown area. Many C-group buildings may be eligible for the National Register as part of historic districts."

D. "Minor or No Importance. Buildings which are insignificant examples of architecture by virtue of original design, or more frequently, insensitive remodeling. This category includes vacant buildings and parking lots. Most D-group buildings are sites of opportunity."

Not Rated. Buildings which have been built or suffered insensitive exterior remodelings since 1945.

CHINATOWN SURVEY

The June 1985 evaluation of the architectural, historical and environmental qualities of Chinatown buildings was undertaken in order to establish the proposed boundaries for a Chinatown Historic District. In order to do this, the Department of City Planning classified individual buildings on the basis of their architectural, historic and contextual importance. By establishing a uniform standard of judgment for each building the review panel was able to compare their discrete elements, both internally and in relationship with other buildings. The review included only those buildings rated A, B or C by the Foundation for San Francisco's Architectural Heritage. These buildings are the most important excamples of Chinese and Western architecture within the study area.

The designation of Individual or Contextual Importance for each building was arrived at after an evaluation of 13 criteria which examined the building's architecture, history, relationship to environment and integrity.

APPENDIX C: TRANSPORTATION

TABLE C-1: VEHICULAR LEVELS OF SERVICE AT SIGNALIZED INTERSECTIONS

Level of Service	Description	Volume/Capacity (v/c) Ratio/a/
A	Level of Service A describes a condition where the approach to an intersection appears quite open and turning movements are made easily. Little or no delay is experienced. No vehicles wait longer than one red traffic signal indication. The traffic operation can generally be described as excellent.	less than 0.60
B	Level of Service B describes a condition where the approach to an intersection is occasionally fully utilized and some delays may be encountered. Many drivers begin to feel somewhat restricted within groups of vehicles. The traffic operation can generally be described as very good.	0.61-0.70
C	Level of Service C describes a condition where the approach to an intersection is often fully utilized and back-ups may occur behind turning vehicles. Most drivers feel somewhat restricted, but not objectionably so. The driver occasionally may have to wait more than one red traffic signal indication. The traffic operation can generally be described as good.	0.71-0.80
D	Level of Service D describes a condition of increasing restriction causing substantial delays and queues of vehicles on approaches to the intersection during short times within the peak period. However, there are enough signal cycles with lower demand such that queues are periodically cleared, thus preventing excessive back-ups. The traffic operation can generally be described as fair.	0.81-0.90
E	Capacity occurs at Level of Service E. It represents the most vehicles that any particular intersection can accommodate. At capacity there may be long queues of vehicles waiting upstream of the intersection and vehicles may be delayed up to several signal cycles. The traffic operation can generally be described as poor.	0.91-1.00
F	Level of Service F represents a jammed condition. Back-ups from locations downstream or on the cross street may restrict or prevent movement of vehicles out of the approach under consideration. Hence, volumes of vehicles passing through the intersection vary from signal cycle to signal cycle. Because of the jammed condition, this volume would be less than capacity.	1.01+

/a/ Capacity is defined as Level of Service E.

SOURCE: San Francisco Department of Public Works, Traffic Division, Bureau of Engineering from Highway Capacity Manual, Highway Research Board, 1965

INTERSECTION ANALYSIS

The capacity analysis of each intersection at which a turning movement count was made utilized the "critical lane" method. This method of capacity calculation is a summation of maximum conflicting approach lane volumes that gives the capacity of an intersection in vehicles per hour per lane. (This method is explained in detail in an article entitled "Intersection Capacity Measurement Through Critical Movement Summations: A Planning Tool," by Henry B. McInerney and Stephen G. Peterson, January 1971, Traffic Engineering. This method is also explained in "Interim Materials on Highway Capacity", Transportation Research Circular No. 212, Transportation Research Board, January 1980). The maximum service volume for Level of Service E was assumed as intersection capacity. A service volume is the maximum number of vehicles that can pass an intersection during a specified time period in which operating conditions are maintained corresponding to the selected and specified Level of Service (see Table D-3). For each intersection analyzed, the existing peak-hour volume was computed and a volume-to-capacity (v/c) ratio calculated by dividing the existing volume by the capacity at Level of Service E.

APPENDIX D: TYPICAL NOISE LEVELS

	Decibels	
	110	Pile driver (from 50 feet)
Very Loud	100	
		Light helicopter take-off (from 125 feet)
	90	
		Diesel truck (from 50 feet)
	80	
Loud		Radio or TV playing in Living Room
	70	
		Passenger car on city street (from sidewalk)
	60	
Quiet	50	
	40	
		Whisper
Very quiet		
		Rustle of paper
	30	

SOURCE: Department of City Planning, "A Proposal for Citizen Review: Transportation Noise, Environmental Protection Element of the Comprehensive Plan of San Francisco," August 1984.

APPENDIX E: AIR QUALITY

TABLE E-1: SAN FRANCISCO AIR POLLUTANT SUMMARY, 1982-1985

STATION: 900 23rd Street, San Francisco

POLLUTANT:		STANDARD	1982	1983	1984	1985
OZONE (O_3) (Oxidant)						
1-hour concentration, ppm/a/						
Highest hourly average	0.10 /b/	0.12 /c/	0.08	0.13	0.10	0.09
Number of excesses of state standard			0	1	1	0
Expected Annual Excess (federal)/d/			0.0	0.3	0.3	-
CARBON MONOXIDE (CO)						
1-hour concentration, ppm						
Highest hourly average		20 /b,e/	12	7	11.0	10.0
Number of excesses of standard			0	0	0	0
8-hour concentration, ppm						
Highest 8-hour average		9 /b,c/	9.1	5.1	7.7	7.1
Number of excesses of standard			1	0	0	0
TOTAL SUSPENDED PARTICULATE (TSP)						
24-hour concentration, ug/m^3/a/						
Highest 24-hour average		100 /b,f/	126	117	152	158
Number of excesses of standard/g/			3	4	5	5
Annual concentration, ug/m^3						
Annual Geometric Mean		60 /b,f/	57	55	60	62
Annual excess of standard			No	No	Yes	Yes
LEAD (Pb)						
30-day concentration, ug/m^3						
Highest 30-day average		1.5 /b/	0.7	0.4	0.7	0.3
Number of excesses of standard			0	0	0	0
NITROGEN DIOXIDE (NO_2)						
1-hour concentration, ppm						
Highest hourly average		0.25 /b/	0.13	0.13	0.14	0.18
Number of excesses of standard			0	0	0	0
SULFUR DIOXIDE (SO_2)						
24-hour concentration, ppm						
Highest 24-hour average		0.05 /b/	0.012	0.018	0.03	0.07
Number of excesses of standard/g,h/			0	0	0	0

/a/ ppm: parts per million. ug/m^3: micrograms per cubic meter.
/b/ State standard, not to be equaled or exceeded, except for CO standards, which are not to be exceeded.

(Continued)

TABLE E-1: SAN FRANCISCO AIR POLLUTANT SUMMARY 1982-1985 (Continued)

/c/ Federal standard, not to be exceeded more than once per year, except for annual standards, which are not to be exceeded.
/d/ Expected Annual Excess is a three-year average of annual excesses of the federal standard.
/e/ The state one-hour CO standard was revised from 35 ppm to 20 ppm in January 1983. The federal one-hour standard remains 35 ppm.
/f/ The California ARB has redefined the state particulate standard to apply to "inhalable" particulates only (i.e., those which have a diameter less than ten microns). The new standards are 50 ug/m^3 for 24-hour averages and 30 ug/m^3 for the annual geometric mean. No data is currently available on the particle size distribution of the TSP sampled at the San Francisco monitoring station.
/g/ Number of observed excess days (measurements taken once every six days).
/h/ Exceeding the SO_2 standard is a violation only if a concurrent excess of the state ozone or TSP standards occurs at the same station. Otherwise, the federal standard of 0.14 ppm applies.

SOURCE: BAAQMD, 1981 - 1983, Air Quality in the San Francisco Bay Area; and California ARB, 1982 - 1985, California Air Quality Data.
